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DOCKET NUMBER

PROPOSED RULE PR-Misc.

(NUREG/CR-1750)
 (46 FR-12917)

4

April 29, 1981



Secretary of the Commission
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555

Subject: Commonwealth Edison Company Comments
 on NUREG/CR-1750, "Analysis, Con-
 clusions, and Recommendations Concerning
Operator Licensing"

Reference: D. G. Eisenhut letter to All Licensees of
 Operating Plants and Holders of Construction
 Permits dated January 27, 1981. (Generic
 Letter No. 81-02).

Dear Sir:

Commonwealth Edison Company has reviewed the subject
 document and offers the attached comments. We appreciate being
 given the opportunity to comment.

Very truly yours,

J. S. Abel
 J. S. Abel
 Director of Nuclear
 Licensing



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Attachment

Commonwealth Edison Company
Comments On NUREG/CR-1750
"Analysis, Conclusions, and Recommendations
Concerning Operator Licensing

Commonwealth Edison considers NUREG/CR-1750 to be a sound document, which we generally support. The following findings and recommendations are particularly noteworthy.

1. The development of written examinations that are more operationally oriented.
2. A requalification program that is performance related and less repetitious.
3. The development of training programs based on plant-specific task analyses.

In addition, we strongly support the conclusion that a college degree in engineering or a related field is not necessary for the Shift Supervisor position.

The following comments, some of which disagree with the NUREG, are also offered:

1. Page 6 and Section 2.5.4.5 - The requirement that an SRO candidate have at least one year as a licensed operator should not apply to a degreed person. We have to retain the ability to license our STA candidates (the Commonwealth Edison STA program calls for SRO licensed college graduates with additional special training), as well as other technical personnel as required. In addition, union rules do not allow management personnel to operate equipment over a time period as long as this.
2. Page 7 - The requirement to have utility corporate management interview every candidate for a reactor operator's license is very impractical. Making this a requirement would result in a corporate manager being tied up full time interviewing candidates for reactor operator's licenses. This is a function that should be performed by the Station Superintendent since he is responsible for operation of the station.

3. Page 9 - NSAC review and publication of significant events and INPO guidance should be the source of operating experience information.
4. Page 11 and Section 3.5.2 - We do not agree with the requirement that utilities should formally certify the qualifications of non-licensed personnel. We believe that this requirement could be fulfilled by documentation of satisfactory completion of an appropriate training program.
5. Page 12 - Consideration should be given to using SRO licensed senior instructors at vendor training centers to administer operating tests on simulators on a permanent basis.
6. Page 2-122 - Section 2.5.1.7, Item 4 of Recommendations. While the concept of one year experience as a non-licensed operator before licensing is good, some type of waiver is necessary for cold plants.
7. Page 2-123 - Section 2.5.1.7, Item 5 of Recommendations. This item does not require either support or action of the NRC. The recommendation is basically a personnel advancement issue and that advancement should be a judgment based on abilities or established criteria versus solely based on seniority. Although this recommendation is very sound, strong unions will make it extremely difficult, if not impossible, without support from the NRC.
8. Page 2-244 - Section 2.8.2.2, Item 3 of Recommendations. Instead of specifying college semester hours, base the recommendations on the task analysis and address topics and depth required. An academic approach may be one of several alternatives to accomplish the above.