



IBEW Local Union 2150

International Brotherhood of Electrical Workers
6227 W. Greenfield Avenue
West Allis, Wisconsin 53214

DOCKET NUMBER
PROPOSED RULE

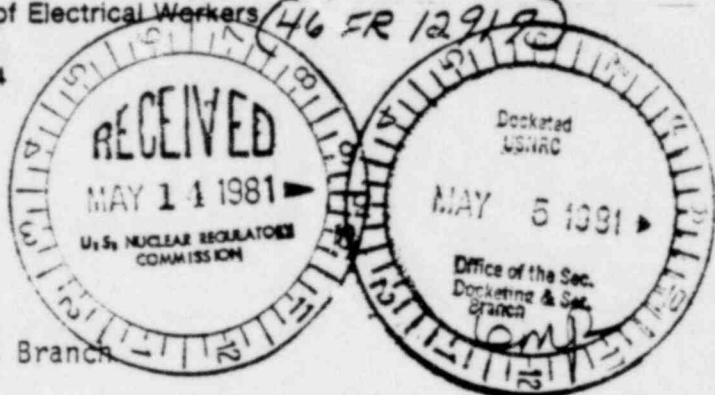
(3)
PR-Misc.
(NUREG/CR 1750)
(46 FR 12912)

414L774-1190

April 30, 1981

Secretary of the Commission
US Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Services Branch



COMMENTS TO NUREG/CR-1750

This study clearly shows that the requirement of a college degree is not a necessity for a Shift Supervisor. The table on page 2-23 clearly relates the performance of RO's is directly dependent on their years of operating experience as does the table on page 2-25 for SRO's. Whether a person has a degree or not seems to make little difference. Some level of engineering training may be desirable for SRO's, but these credits would be earned by attending school during the period prior to becoming a Shift Supervisor. The requirement proposal of having a degree will force RO's to leave an industry already plagued with a shortage of qualified people. To deny the advancement to Shift Supervisor takes away the initiative of RO's to further their expertise. This report bears out that fact in the conclusion of upgrading of Licensed Operators on page 2-236.

The training and retraining of Operators has been lacking in this direction in the past and now needs an overhaul and upgrading. Too much time has been spent on theory of operation in retraining and not enough on operating experiences and characteristics. Simulator training on similar plants is a good type of this operating training. However, the requirement for a generic type simulator for each plant is both impractical and wasteful.

One of the most misleading comparison used by this study is the US Navy program versus private industry. Private utilities have neither the funding nor number of personnel available to conduct a military type training. The military concept of training used in private industry could possibly have a further effect on qualified people leaving the nuclear industry.

The Navy has found that money is the answer to retention of people. Utilities cannot afford the large bonuses and pro-pay that the Navy uses, so they are forced to find some other way to retain people. The study points out some of the basic needs of the industry to try to retain people on page 2-261.

The section dealing with nonlicensed support people is a clear picture of the industry's attitude toward training. Very few utilities have ongoing training programs for nonlicensed people.



10
8106035

10-11

A Licensed Operator must keep up with all the latest changes in the nuclear industry and must be annually requalified. A form of continuing training is also needed for nonlicensed people in the latest technology used in the industry. They should also have a limited knowledge of the systems and how they interact to operate the plant.

Examiners should be required to obtain an SRO license and have some familiarity with the day to day operation of a nuclear plant. This would enable them to have a better understanding of the jobs they are examining. They would also be better qualified to ask operating questions rather than theory questions. They should have similar annual requalification training in matters that pertain to the licensing program.

The summary of recommendation clearly illustrates that the problems in training and licensing lie with both the NRC and the Licensee. Cooperation and guidance between the two factions is sorely needed, rather than the "Watchdog-Underdog" attitude that now prevails in the nuclear industry. Explicit guidelines from the NRC are needed, not vague outlines, in order to allow utilities to set up formal and ongoing training programs for all workers in nuclear plants. Examining each plants program as it relates to that plant is the best method of evaluating the training given, rather than using the "Tar-brush" method, ie. same program for all PWR's, BWR's, etc. Each plant has its unique operating characteristics and its training program should reflect this.

In conclusion, the study shows a definite need for the updating of training programs. It also brings out the need for interfacing and cooperation between the utilities and the NRC toward this goal. It would be a shame and waste if the NRC did not study the recommendations of this survey completely and try to implement some of them rather than making regulation changes to the contrary. Too often the regulation changes look at only one aspect of a problem rather than the entire problem itself. This tends to further the over-regulation problem that now exists in the nuclear industry.

Yours very truly,

Thomas A. Suttner

Thomas A. Suttner
Point Beach Nuclear Power Plant
Local 2150, IBEW

jo/opeiu/local 9