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GR-0481-15

Secretary of the Commission (46 FR /29/1)
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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U.S. MUCLEAR REGULATORS
COMMISSION
REF:

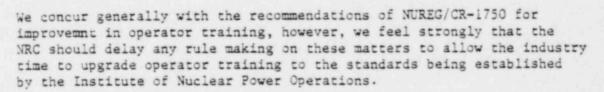
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SUBJECT: Arkansas Nuclear One - Units 1 and 2
Docket No's. 50-313 and 50-368
License No's. DPR-51 and NPF-6
Reactor Operator Qualifications,
Comments on NUREG/CR-1750

(File: 1510.3 and 2-1510.3)

"Analysis, Conclusions, and Recommendations Concerning Operator Licensing" (Generic Letter

No. 81-02)



Although the ANO Training Program currently under development includes virtually all the recommendations in NUREG/CR-1750, we disagree on the necessity to require college courses for an SRO, however, we favor this recommendation on SRO required college education vice the degree requirements of SECY-81-84. Arkansas Power & Light Company's ability to continue to safely operate ANO is dependent on the pursuit of the best experience/training combination for these operators in order to ensure their qualification, high morale, and peak output. Over qualification for any position leads to low morale, high turn-over rates, cost inefficiency, and less productive individuals. NUREG/CR-1750 offers the Commission, except as previously noted, favorable recommendations for future operator qualification regulations and also independent agreement with the position that SECY-81-84 proposes over qualification of operators.

Very truly yours,

David C. Frielle

David C. Trimble Manager, Licensing 12.11