



ARKANSAS POWER & LIGHT COMPANY
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PR. Mis. Notice
(NUREG/CR-1750)

(46 FR 12917)

GR-0481-15

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



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)



REF:

"Analysis, Conclusions, and Recommendations
Concerning Operator Licensing" (Generic Letter
No. 81-02)

Gentlemen:

We concur generally with the recommendations of NUREG/CR-1750 for improvement in operator training, however, we feel strongly that the NRC should delay any rule making on these matters to allow the industry time to upgrade operator training to the standards being established by the Institute of Nuclear Power Operations.

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. Trimble

David C. Trimble
Manager, Licensing

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