



Carolina Power & Light Company

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Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, D. C. 20555

ATTENTION: Docketing and Service Branch



COMMENTS ON NUREG/CR-1750
ANALYSIS, CONCLUSIONS, AND RECOMMENDATIONS
CONCERNING OPERATOR LICENSING

Dear Sir:

In response to Generic Letter No. 81-02 sent to all licensees of operating plants and holders of construction permits on January 27, 1981, Carolina Power & Light Company (CP&L) submits the following comments concerning NUREG/CR-1750, "Analysis, Conclusions, and Recommendations Concerning Operator Licensing." Overall, CP&L believes that this report provides many reasonable alternatives to the current licensing process, and if utilized, would benefit the industry as well as the general public.

The comments are provided by section and are keyed to the recommendations in the NUREG.

Section 2.3 - Performance Predictive Indices

The conclusion states that there is "no statistically significant relationship between RO and SRO examination scores and operator performance." CP&L believes this statement to be true. The industry has been forced to train people to pass the NRC examination and then train them to operate the plant. The NRC examinations should be changed so that examination scores reflect the ability of the operator to perform his duties safely and effectively.

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Section 2.4.5.2 - RO and SRO License Training

1. A formal assessment of RO and SRO training programs is needed, and a job task analysis is the proper method. However, if we perform the task analysis and change our training programs based on the results, we will not be able to get our people through the NRC license examination unless it is also changed on the same basis. Our training programs will become more effective when the license examination is changed to an effective tool to evaluate RO and SRO job performance. This change would reduce our total training load by requiring us to teach what an operator needs to know to be a good operator and eliminate the need to teach the examination.
2. CP&L concurs with this recommendation.
3. The SRO simulator training is needed. A specific program for SRO candidates is needed to reinforce the skills that an SRO uses versus the skills used by an RO. For this reason, Alternative b is not acceptable as it would only reinforce RO skills. Alternative a to this recommendation should be phased in as more simulators are placed in service.
4. All training programs need a periodic review to prevent stagnation. The reviewing authority should be familiar with instructional techniques and effective curriculum material. The plant operations review committee would not normally provide an adequate review. The review should be conducted at a higher level in the training organization that is not directly involved in the license training. The review should be periodic and formal.
5. One week of simulator training is definitely insufficient for a license candidate. The candidate should be capable of handling any normal or abnormal situation during his simulator examination. The length of training needed will vary depending on the plant and the simulator utilized. The minimum time should be set based on a plant-specific simulator since a nonspecific simulator will require additional training time.
6. A plant-specific simulator is an ideal goal. However, the use of a simulator that has the same type control board and basically the same plant is certainly adequate. Alternatives a, b, and c concerning the location of the simulator all have advantages and disadvantages. It should be left up to each individual utility to decide upon the location of the simulator.

7. Training programs should require approval by NRC, and be based on a firm foundation such as a job task analysis. As already stated, the current requirements do not have this type of foundation; therefore, an audit or approval at the present time would not be useful.
8. JP&L concurs with this recommendation.
9. The NRC should periodically audit all license training programs. Accreditation could be performed by NRC or by INPO.
10. This recommendation is unnecessary and would add an administrative burden without any benefit. Simulator programs should be audited periodically as suggested in Recommendation 9.
11. This recommendation is also unnecessary if Recommendation 9 is adopted.
12. CP&L concurs with this recommendation.

Section 2.5.1.7 - Selection of RO Candidates

1. This recommendation should be left up to each individual utility. A wide variety of pre-employment examinations is available.
2. The mental stability of Nuclear Operations personnel is an ongoing concern of each utility. CP&L agrees that a psychological assessment during operator training is beneficial. In addition, supervisors need to be trained to detect unsuitable personality dysfunctions since the concern still exists after licensing.
3. CP&L does not believe that this is an appropriate area for regulation. Retention is an ongoing problem in the nuclear utility industry.
4. This recommendation is adequate for operation personnel, but would create substantial problems for license candidates whose background is in nonoperations jobs. Therefore, a blanket recommendation of one year as an auxiliary operator is inadequate.
5. CP&L concurs with this recommendation. A formal evaluation of each listed area should be done as part of the selection process.
6. CP&L concurs with this recommendation.

Section 2.5.2.6 - Screening of RO Candidates During Training

1. CP&L concurs with this recommendation; however, it is believed that regulation is not required. The license application certifies that the candidate has completed his training. The methods used to determine the candidate's performance prior to the license examination should be left to the utility.
2. The NRC certifies the ability of each operator to safely operate the plant. Requiring the utilities to submit a list of each candidate's weak areas could bias the examination. This could cause an examiner to concentrate on weak areas as reported by the utility and possibly miss a weak area that was also missed by the utility, thereby licensing a potentially unsafe operator. The license examination needs to remain an independent verification of the operator's knowledge.

Section 2.5.3.6 - Certification of RO Candidates

1. The requirement for the highest corporate officer in charge of Nuclear Operations to sign license applications may actually be contrary to the intent of this recommendation. The manager of a nuclear facility is the highest level of management on site and is in a good position to assess the candidate's appreciation for reactor safety as well as his personal character. This should be an ongoing assessment and not a one-time interview as would be the case when the Vice President is required to conduct the interview.

Section 2.5.4.5 - (SRO) Selection Requirements

1. The interim requirement of 30 semester hours of college may or may not be valid. The task analysis needs to be completed before putting arbitrary requirements on SRO selection. Interim requirements have a tendency to become permanent requirements whether or not they are justified. Formal accreditation of utility SRO programs should serve everyone's needs. This is an area that INPO is currently working on. The NRC should wait and see what the result of INPO's process is before initiating any more "interim" requirements.

Section 2.6.4.2 - Operator Licensing Recommendations

1. CP&L concurs with this recommendation.
2. CP&L concurs with this recommendation.
3. CP&L concurs with this recommendation.
4. The basic recommendation for a full-scope simulator examination is valid. However, the interim measure of favoring vendors should not be incorporated. The operator licensing branch should conduct all simulator examinations on all simulators. The vendors are potentially subject to commercial concerns, just as utilities might be, so one cannot assume that a vendor examination will be any more valid than a utility administered examination. In fact, it may be less valid due to the potential impact on the utility of improper operator response during a casualty.
5. CP&L concurs with this recommendation.

Section 2.7.1.9 - Licensed Operator Requalification Programs

1. CP&L concurs with this recommendation.
2. CP&L concurs with this recommendation. The thrust of simulator retraining should be quality of training and not quantity. Currently, many simulator requalification programs cover all of the requirements of H. R. Denton's March 23, 1980 letter in three or four days. This period is too short to allow adequate retraining. The "required evolutions" should be kept to a minimum to cover them effectively and allow simulator training to go into gray areas that the NRC may not have considered important. There exist many accident scenarios that are not addressed in the new requirements because it would be impossible to cover every conceivable series of events.
3. CP&L concurs with this recommendation.
4. CP&L concurs with this recommendation. However, significant lessons learned should be provided to the utilities and consequently to the operators as quickly as possible. Dissemination of these significant events should not wait for scheduled training classes. The NRC should be charged with the data reduction function so that everyone can concentrate on the significant events.

5. CP&L concurs with this recommendation.
6. CP&L concurs with this recommendation.
7. CP&L concurs with this recommendation.

Section 2.7.2 - Operator Error Reporting

CP&L concurs with all the recommendations in this section. The method used to determine the cause of personnel error events must be objective. It is very easy to lay blame on personnel error instead of looking for the real cause. We do not need to legalize "Monday morning quarterbacking"; we need to determine true cause and then take the appropriate corrective actions.

Section 2.8.2.2 - Upgrading of Licensed Operators

1. This is a valid recommendation. However, the comments in Section 2.8.4.2, Recommendation 4, apply here also.
2. This is a valid recommendation. However, at the present time it is impractical due to the shortage of licensed operators and the existing amount of required requalification training. If and when the requalification requirements are written based on the job task analysis, this would be a beneficial step to take.
3. The 30 semester hours recommendation is arbitrary. The requirements should not be instituted until the task analysis is complete and the need for specific college-level training is identified. Then the identified training should be instituted and existing personnel upgraded as necessary.

Section 2.9 - Compensation, Status, and Motivation

Overall, these are valid recommendations. However, CP&L does not believe that this area is appropriate for regulation.

Section 2.10 - Licensed Training Instructors

CP&L concurs with all of the recommendations in this section.

Section 3.5.2 - Nonlicensed Operating, Maintenance, and Technical Support Personnel

1. This is a valid recommendation. There are many plant employees who are having an impact on the overall safety and yet may not require certification by anyone. The method of certification of "nonlicensed operating, maintenance, and technical support personnel" should be accomplished under the guidance of INPO with the main responsibility placed on the utility, not on the individual. Certify industry methods and let the industry use these methods to certify the appropriate individuals.

Section 4.2.5 - Selection, Training, Certification, and Retraining of Operator Licensing Branch Examiners

1. CP&L concurs with this recommendation. Licensing examiners must be required to have at least the same level of education as those that they will examine. In addition, previous nuclear plant experience should be required. Otherwise, the examinations may not be a valid indication of the candidate's ability to operate the plant safely.
- 2,3,4. If the NRC expects the utilities to do a good job of training and retraining its personnel, then it stands to reason that OLB should set the example. Their program for training and retraining should be complete and formal.

Section 4.3.5 - Staffing of the Operator Licensing Branch

1. CP&L concurs with this recommendation. The use of part-time examiners who cannot obtain or maintain certification should be prohibited.
2. CP&L disagrees with this recommendation. Anyone who is used by the NRC to give any examinations should be required to maintain the same certification as a full-time examiner. This should apply to vendors as well as anyone else.
3. CP&L concurs with this recommendation.

Section 5 - Adequacy of Regulatory Requirements and NRC Implementing Guidance

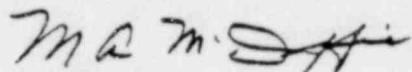
The recommendations stated in this section have already been commented on in other sections. The only general comment is that the time for additional "interim" measures has passed. It is now time to take stock of the situation, do the job task analysis, and complete the final report (regulation); then we can delete all of the "interim" requirements and get down to the business of producing well-trained, quality staffs for the nuclear facilities.

Section 6 - Summary

The narrative of this summary is definitive and should be taken to heart by both the utilities and the Nuclear Regulatory Commission. INPO should take the lead toward advising the NRC of the industries' concerns and directions.

It is requested that the Commission consider the preceding comments. If you have any questions on this subject please contact our staff.

Yours very truly,



for E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

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