

TENNESSEE VALLEY AUTHORITY  
CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II



May 8, 1981

15

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

Attention: Docketing and Service Branch

DUCKET NUMBER  
ISSUES RULE PR-Misc Notice  
NUREG/CR-1750  
46FR12917

Dear Sir:

TVA is pleased to provide comments on NUREG/CR-1750, "Analysis, Conclusions, and Recommendations Concerning Operator Licensing."

We believe the NUREG may be the most conclusive and objective study of the many coming from the TMI-2 incident and, in general, we agree with the recommendations and offer the enclosed comments.

We appreciate the opportunity to comment.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*L. M. Mills*  
L. M. Mills, Manager  
Nuclear Regulation and Safety



Enclosure

cc (Enclosure):

Executive Secretary  
Advisory Committee on Reactor Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Mr. Fred Stetson  
AIF, Inc.  
7101 Wisconsin Avenue  
Washington, DC 20555

8106080103

I.P.-11

ENCLOSURE

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

1. Section 2.4.5.2, Page 2-95, Recommendation No. 3—We suggest that alternative b should be deleted. We believe the "SRO simulator package" should be part of the SRO license training course and not part of the requalification. The training should be very specific with enough time allowed for adequate training and complete evaluation. A well prepared and experienced SRO instructor should present this training.
2. Section 2.5.3.6, Page 2-146, Recommendation No. 1—We believe the time to look at personal character is before hiring, during the time the individual is an auxiliary operator, again before placing in RO training and during the RO training program. The operation superintendent, as advised by shift supervisors and training supervisors, should make the decision as to the personal character of the RO candidate. An interview by the utility vice president would provide him with very little information on which to make a judgement. Information gained over a period of greater than one year by the operation superintendent will be much more accurate in determining personal character.

We agree with other recommendations made in this area.

3. Section 2.7.1.9, Page 2-219, Recommendation No. 7—We agree that the requalification program should be comprehensive, performance-related, less repetitive, and more challenging to the plant licensed operators. However, we do not totally agree with the proposed requalification program presented.

We suggest that in addition to the one to three weeks of offshift requalification training, an ongoing, onshift program be developed. Extra onshift RO's and SRO's, when not on the job, can be participating in onshift training.

Human factors experts indicate that operator alertness greatly decreases with time. If extra onshift RO's and SRO's were available, both additional training and an increase in operator alertness on the control board could be achieved. This would also provide readily available help if an emergency situation should develop. The plant training organization could be adjusted to provide onshift coverage. Programs could be outlined by the training organization for each year's onshift program. This type of program would be more likely to maintain the operators at a fairly constant level of proficiency than the proposed upgrade every five years.

We agree with annual operating tests on the simulators and think this should be supplemented with oral examinations. Where operating tests and oral examinations indicate some possible areas of weaknesses, additional written examinations could be administered on a case-by-case basis in those areas. We believe this method of examination by NRC could accurately determine the level of competence of each licensed individual. We would also propose that the present annual requalification written examination be deleted and agree that with the above described method of annual evaluation the comprehensive written and oral examinations every five years would be adequate for accurate NRC licensed operator evaluation.

We believe the above approach would be more effective and more acceptable to the industry.

4. Section 3.5.2, Page 3-26, Recommendation No. 1--We agree with the recommendations which specifically require utilities to formally certify the qualifications of all nonlicensed plant personnel identified in conclusion 1, pages 3-25, for those responsibilities which are safety-related. We believe a certification program similar to that proposed by INPO for operator instructors should be established by each utility. Such a program would place the responsibility on the utility but in concert with INPO for administration.