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MISSISSIPPI POWER & LIGHT COMPANY
Helping Build Mississippi
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JAMES P. McGAUGHY, JR.
ASSISTANT VICE PRESIDENT

June 12, 1981

Dr. Steven H. Hanauer, Director
Human Factors & Safety Division
U. S. Nuclear Regulatory Commission
7920 Norfolk Avenue, Room P-518
Bethesda, Maryland 20014

SUBJECT: Grand Gulf Nuclear Station
Bechtel Job No. 9645
0272/00765
Operator Qualifications and
Licensing 10CFR Parts 50 and 55
AECM-81/206

Dear Dr. Hanauer:

We have carefully reviewed the Proposed Rule to 10CFR 50 and 55 as prepared by Commissioner Gilinsky, and have the following comments:

(1) We agree with the concept of replacement of the Bachelor's Degree requirement with college level technical subject hours. MP&L, however, will continue with the Bachelor's Degree program for those interested and motivated supervisors. This educational opportunity that the company will supply is thought to be a positive stimulus to enhancing the position and professionalism of the Shift Supervisors/Superintendents.

(2) Clarification should be inserted into paragraph 55.3(c) and 55.4(i). While the definition rendered for Shift Supervisor as "the senior operator in charge of licensed activities during a shift" is clear for a one unit facility, it is not expressly clear for dual unit reactors where there are three senior reactor operators present (i.e., Shift Superintendent and 2 Shift Supervisors). This ambiguity is multiplied because of the diversity of titles applied by many corporations for the person in charge of shift operations (not necessarily Shift Supervisor). MP&L proposes that this definition be revised to specify the Shift Supervisor as the "senior licensed management representative on shift."

(3) We concur with the intent of proposed rule for Shift Supervisor License requiring five years of responsible nuclear power

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plant experience, including two years as a licensed SRO, one of which is on the plant for which license is requested. However, we disagree with the manner in which this is to be implemented. We concur with the requirement for additional amount of responsible nuclear power plant experience, however, we propose this experience requirement to read "four years responsible nuclear power plant experience which involved supervising integrated systems and/or plant operation."

We also do not concur with the two years as SRO control room experience. The main effect of this requirement will not be directly felt by operating reactors as surmised, but will greatly impact NTOL's and other units under construction. There is no way that these units can comply and still startup a new plant, except by directly pirating the operating nuclear units. We agree that having experienced personnel in the control room during startup is important and in many cases imperative, however, there are various methods available to insure this experience without dictating two years as SRO. A person may obtain extensive practical experience in plant operations in a combination of qualifications and work experiences; for example, a typical navy nuclear power officer receives one year of theoretical and practical hands on training prior to qualifying as an EOOW. On board ship, he must again qualify as EOOW prior to assuming watchstanding duties. He typically completes four years of these responsible duties prior to hiring by a utility. This same individual when Simulator Certified and plant specifically trained, is in charge of a shift during the preoperational test program, which is an intensive learning experience. We consider this individual to meet the intent of the proposed rule, and therefore request alternate sources of qualifications be specified as equivalent to two years as an SRO in a control room. There are many scenarios for this equivalency, and we recommend an NRC-industry panel be appointed to arrive at acceptable standards. (See Attachment I for examples).

We appreciate this opportunity to comment on these proposed rules, and will assist in whatever way possible to resolve these issues.

Yours truly,

JPM:et
Attachment
cc: See attached sheet

cc: Mr. N. L. Stampley
Mr. G. B. Rogers
Mr. R. B. McGehee
Mr. T. B. Conner

Mr. Victor Stello, Jr., Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, DC 20555

ALTERNATIVES TO TWO YEARS OF CONTROL ROOM EXPERIENCE AS A LICENSED SRO

1. Bachelor of Science Degree in Engineering or related sciences plus extensive experience (four or more years)* in Startup or Operations on the plant for which he is to be licensed.

   This would assure the individual has the educational background to learn the requisite skills and sufficient exposure to the physical plant to attain the proper level of technical expertise.

2. Sixty college credits, at least two years experience as a Reactor Operator (licensed RO) on a similar plant and at least one year experience in Startup or Operations on the plant for which he is obtaining a license.

   This would assure the individual has been exposed to actual plant operations on similar plant, and has an adequate educational background to learn the theoretical aspects of the Shift Supervisor's job.

3. Extensive control room operating experience (four or more years) on a military or DOE operated nuclear reactor. The individual shall have been qualified or certified at a level comparable to a NRC RO license during that time, plus at least two years experience in Startup or Operations on the plant for which he is obtaining a license.

   This would assure that the individual has been exposed to extensive control room operations in an operating nuclear reactor, and has been exposed to the physical plant long enough to correlate his previous experience to the plant he is licensing on.

* For initial startup, this shall include that period immediately prior to initial fuel load.