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**Dalwyn R. Davidson**  
VICE PRESIDENT  
SYSTEM ENGINEERING AND CONSTRUCTION

June 15, 1981



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

Dear Mr. Hanauer:

At the request of INPO President E. P. Wilkinson, the Cleveland Electric Illuminating Company has reviewed Mr. Gilinsky's May 27, 1981 memorandum regarding Operator Qualifications and Licensing Proposed Rule (SECY 81-84) and offers the following comments:

1. The proposed rule is a reasonable attempt at upgrading the educational requirements of licensed senior operators and shift supervisors. Recognition of the value of operating experience and development of a timetable to permit upgrading at a pace consistent with full-time employment as an operator are positive factors.
2. The proposed rule fails to provide a reasonable timetable for plants in construction to meet the educational requirements for senior operators and shift supervisors. The Illuminating Company began a program of on-site, college-level education for such operators in September 1980 after working diligently with Ohio State University in developing a suitable program based on the interim guidance. Even though CEI was among the first utilities to begin such a program, the stated requirements cannot be met by Fuel Load (May 1983). Certainly the Commission would agree with the need to involve these same senior operators in preoperational testing while also preparing for SRO license examinations. To accommodate construction permit applicants, the stated requirements should be phased in over a period of two or three years after Fuel Load, similar to the graduated requirements established for credit by experience (no earlier than January 1, 1985). This is necessary to allow proper program development and still maintain the operator involvement with preoperational testing and license preparation since candidates for these positions, in most cases, have already been selected and at least partially trained at this time. Other construction permit applicants may require more time based on their personnel acquisition schedule and license training needs. We believe the education requirements should be handled on a case-by-case similar to the experience requirements, at least until the present staffs have time to adjust to the additional training requirements.

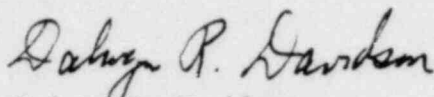
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It is hoped that these comments will be considered in the formulation of the final rule and that stability in the operator license requirements is achieved. Anxiety and concern on the part of a large number of dedicated professionals involved with the operation of commercial nuclear power plants will be alleviated once a reasonable and fully justified final rule is established.

Sincerely,



Dalwyn R. Davidson  
Vice President  
System Engineering  
and Construction Group

CC: E. P. Wilkinson, President  
Institute of Nuclear Power Operations  
1820 Water Place  
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