

June 19, 1981

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



COMMENTS ON SECY 81-84

Dear Dr. Hanauer:

The Institute of Nuclear Power Operations (INPO) has provided Carolina Power & Light Company (CP&L) with a copy of a version of SECY 81-84 prepared by Commissioner Ahearne and requested that we provide you with our comments. Accordingly, CP&L offers the following comments for your consideration:

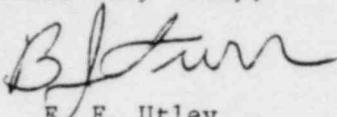
We know of no supporting evidence that "a general indication of knowledge of physical science, mental aptitude, and sense of responsibility," as measured solely by having a degree, is required beyond the training presently required for operators. Nor is there evidence that a degreed operator is necessarily better than a nondegreed operator. It is the combination of technical and operational training and knowledge which can lead to better operators. This sort of skills development is best improved by training and educational programs which are oriented towards operation and technical knowledge, but does not, in our opinion, require a college degree as a prerequisite.

The second paragraph on page 17 speaks generally of the desirability of obvious career paths for operators. The degree is incidental (and helpful) for the career path, but not necessary to be a good operator. The Commission needs to evaluate the license examination requirements against the requirements for plant operation, not against the supposition that having degreed operators will result in better operators.

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We believe that utilities should make every effort to upgrade the technical competence of their nuclear operating personnel. It has been our recent experience that we are not "short" on technical knowledge. As part of our continuing review of our operating personnel capabilities, however, we have recently instituted programs to further increase practical application skills. Therefore, we recommend that increased educational requirements such as BS or BE degrees for reactor operators be supported by sound task analyses rather than by the presumptive approach advocated by Commissioner Ahearne.

Yours very truly,

for 

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

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