

June 10, 1981

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



RICHARD P. CROUSE
Vice President
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Dear Mr. Hanauer:

We have received, through INFO, a copy of the proposed amendments to 10CFR Parts 50 and 55, regarding reactor operator qualifications and licensing. Following our review of these actions as a proposed rule, the following comments are offered for your consideration.

Generally we believe the reduction of educational requirements to 60 semester hours for Shift Supervisors and 45 semester hours for SRO's is a positive step. It is unclear what the regulatory position is regarding the Shift Technical Advisor (STA). We suggest that continued assignment of a Shift Technical Advisor should be considered equivalent to or exceeding the proposed education requirements of Shift Supervisors and SRO's. Any shift which meets these new requirements by the full implementation date should not be required to have an assigned on-site technical advisor, although continued assignment of an STA should remain an option for the utility if the shift personnel do not meet the education requirement by the full implementation date.

This added flexibility would assist the orderly phase-in of the new requirement. Also, we suggest that Shift Supervisors should be required to have the 60 semester hours education upon new assignment to the position or transfer to a different station after the full implementation date. We are very concerned about the ability of our personnel to meet the very stringent requalification requirements of the SRO-licensed positions as well as upgrade their education at the rate proposed. This additional flexibility would assist in stabilizing the nuclear operations work force. Shift Supervisors should be "grandfathered" as qualified to operate the Station they are employed at on the full implementation date-- as long as the STA is also present on shift if the Supervisor does not meet the education requirements.

Also, regarding requalification, we are confident that the proposed change to make annual requalification examination an NRC/Contractor responsibility is a step backward in the upgrade of operator qualification. The utility is the organization responsible for safe operation of the facility and it is generally recognized that they have the most qualified trainers and operators, regarding knowledge of the facility and its operation. Simulator requalification of Senior Reactor Operators annually is an unnecessary burden on the SRO. The Simulator Exam is generally used

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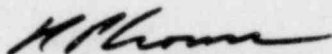
for demonstration of ability to operate controls, skills that the SRO is seldom, if ever, called upon to exercise in his plant. An alternative would be a special SRO/Shift Supervisor examination which tests his required skills.

We again suggest that job task analysis be accomplished before additional regulations or changes are imposed on operating personnel. Unless this is accomplished, NRC will continue to drive good personnel from the industry due to the perception of an over-regulated work environment. This effort will undoubtedly show that the content and format of NRC operator licensing examinations requires change to be more like the methods and procedures of the Federal Aeronautics Administration (FAA) examination of airline pilots. Certainly, elimination of the total reliance on essay exam questions and reduction in theory would be indicated desirable.

We strongly concur with Commissioner Gilinsky's recommendation to set up a committee of specialists to review this proposed rule before the Commission acts on it.

We appreciate the opportunity to input into the rulemaking process on this important issue which affects our employees and our industry.

Very truly yours,



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cc: E. P. Wilkinson
INPO