



Portland General Electric Company



June 17, 1981

Operator Qualification and Licensing

JWL-473-81

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

Dear Dr. Hanauer:

At the request of the Institute for Nuclear Power Operations, we have reviewed a letter from W. J. Dircks to E. P. Wilkinson dated June 9, 1981, and a memorandum from John Ahearne to other NRC Commissioners dated June 9, 1981, both pertaining to Operator Qualification and Licensing (SECY 81-84). We provided comments on this same subject to you in a letter dated June 12, 1981.

Our basic comment is that the NRC should place greater emphasis on the recommendations that have been formulated by the American Nuclear Society in ANS 3.1, Standard for Selection, Qualification and Training of Personnel for Nuclear Power Plants. The NRC was an active participant in the preparation of the most recent draft of this Standard, dated April 10, 1981. This Standard represents a very substantial upgrading of qualification and training requirements for nuclear plant personnel, and the most recent draft constitutes a comprehensive 2-year effort by all segments of the nuclear profession to produce an achievable and acceptable qualification program.

The NRC's emphasis at this time should be in the area of defining a realistic implementation schedule and grandfathering allowance for the adoption of the requirements of ANS 3.1. Full implementation of ANS 3.1 by 1985-86 should be feasible. In addition, we strongly support Commissioner Gillinsky's May 27, 1981 proposal that academic credit be granted for a portion of applicable nuclear work experience.

We are strongly opposed to a requirement for operators, senior operators, or shift supervisors to have BS or BE degrees. Such a requirement would have a major demoralizing effect on current nuclear plant personnel, ultimately leading to a high turnover rate and reduced nuclear experience by

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Dr. Stephen H. Hanauer

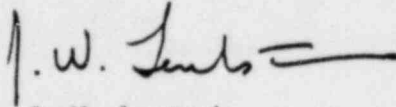
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replacement personnel. The ultimate result could be reduced plant safety. It would also be extremely difficult to hire college graduates into operator positions where shift work is a requirement.

Thank you for your consideration of these comments.

Sincerely,



J. W. Lentsch

Manager of Generation Licensing & Analysis
Nuclear Division

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Attachment

c: E. L. Thomas, INPO
J. F. Mally, NSAC