

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

June 10, 1981

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

Serial No. 357
NO/FBC, ERSjr:smv

Dear Dr. Hanauer:

The Virginia Electric and Power Company is pleased to comment on SECY 81-84. We believe that the current requirements for the education, experience and training of operation personnel and the current recognition of the operator and senior operator levels of certification are sufficient and provide the level of assurance necessary to place qualified persons in the operator, senior operator and supervisor positions.

Further requirements are burdensome to the individual and would cause an undue hardship for up to three years devoting as much as four hours per day to your proposed educational requirements. This is in addition to the current retraining and recertification programs already in place. Further, your earlier proposal and the proposal now being modified have already created morale problems in the industry since most currently licensed personnel do not meet your proposed requirements and their natural inclination is to worry about the uncertainty that you have placed upon them.

Finally, we believe that if adopted, your proposed rule would not create a better operator than we currently have.

If I may provide additional information on this subject, please contact me.

Very truly yours,

R. H. Leasburg
Vice President -
Nuclear Operations

cc: Mr. E. P. Wilkinson, President
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