

THE CINCINNATI GAS & ELECTRIC COMPANY



June 9, 1981

Dr. Steven H. Hanauer  
Director  
Nuclear Regulatory Commission  
Washington, D.C. 20555



RE: WM. H. ZIMMER NUCLEAR POWER STATION-UNIT 1  
OPERATOR QUALIFICATIONS AND LICENSING  
PROPOSED RULE (SECY-81-84)

Dear Dr. Hanauer:

The Cincinnati Gas & Electric Company, for itself and as agent for The Dayton Power and Light Company and the Columbus and Southern Ohio Electric Company, offers the following comments on SECY-81-84.

The utility Group on Qualification of Reactor Operators (QRO) previously provided comments on NUREG/CR-1750 "Analysis, Conclusions, and Recommendations Concerning Operator Licensing", which were broader in scope and are still relevant to the proposed rule now under consideration. In view of the short time we were permitted to prepare our preliminary comments on revisions to SECY-81-84, we did not provide a comparative text of a proposed rule, rather, we prepared a set of tables which itemized proposed requirements on elements which could be written in rule form. (Enclosure A) We have also prepared for comparison our current understanding of the proposed changes to SECY-81-84 as obtained from the Commissioner Gilinsky papers, the summary sheet, and the transcript of the Commission's meeting. (Enclosure B)

The principal problems, although not totally inclusive, center on three major issues:

1. The newly-generated requirement that in addition to the shift supervisor being a senior operator that he be licensed as a shift supervisor;
2. The imposition of newly-generated college level requirements will impose hardship and unnecessary requirements on currently licensed personnel; and,
3. The required experience levels of operators will be unattainable for plants licensed in the future.

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The QRO proposed concept will provide competence levels equivalent or superior to the Commission's current proposal, eliminate the objections enunciated above, and enhance retention of the current cadre of well trained and competent operators. Each of the major issues will be discussed in the following sections.

The need to license a shift supervisor other than as a SRO is not apparent. There is no question that a shift supervisor needs to be competent and well trained. The utility, which has the responsibility for the safe operation of its facility, should retain the prerogative of selecting and appointing its managers for shift operations. The technical competence of a shift supervisor should be that of a Senior Operator and he should have recognized supervisory skills, leadership qualities, and personality traits to be an effective manager. The recognition and monitoring of these attributes can best be accomplished by licensee management without the need of the administrative burden of a licensing process. Our proposed regulation would require licensee management to consider those traits enumerated as necessary to be licensed.

The imposition of approved college level training or college degree may or may not assure technical competence in a desired area. It is our opinion that the proper course of action is to establish the needed area of technical knowledge through a job-task analysis (or other means), and then determine if an individual has acquired knowledge of those areas through previous college work, military instruction, commercial instruction, equivalent work experience; or if additional training is required. If a prospective senior operator or supervisor is in need of additional instruction, the avenues available to attain them are varied. Our proposal would require a determination of the needs for instruction for a particular level within 2 years with the requisite training to be completed within 5 years.

The establishment of required experience levels would most likely promote supervisory instability through encouragement of pirating of personnel. As currently written, for newly licensed plants, there is no way of meeting the requirements except by hiring talent from an operating plant (which decreases experience level at that plant), or obtaining a waiver to the regulations (a difficult, if not impossible, task.) Our Proposal would permit the licensing branch to reduce the experience levels a specified amount for new plants based upon their review of the qualification of the incumbent.

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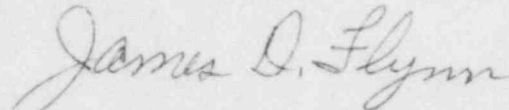
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One final item which we believe should be considered is that of the shift technical advisor. If a utility elects to upgrade training to a designated shift person, it should be permitted to discontinue the use of a shift technical advisor. We believe this was intended by the initial Lessons Learned task activity. The requirements for this alternative should also be considered in the development of the final rule.

We would be pleased to discuss our proposed alternative with you or your staff at your convenience.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY



JAMES D. FLYNN, Manager  
Licensing and Environmental Affairs

JDF:gaj

Attachments

cc: E. P. Wilkinson (1/1)  
E. A. Borgmann (1/1)  
Donald F. Knuth (1/1)