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June 5, 1981

The Honorable J. M. Hendrie Acting Chairman U. S. Nuclear Regulatory Commission Washington, DC 20555

Re: Qualification of Reactor Operators

Dear Mr. Chairman:

The proposed rulemaking on reactor operator qualification (SECY-81-84) is a cause of deep concern to Power Authority of the State of New York. I urge the Commission to postpone further action on SECY-81-84 until the Commission and its staff have fully assessed the possible negative effects of the proposed changes.

SECY-81-84 assumes that reliable reactor operators must have obtained a Bachelor of Science degree. Such a narrow overly academic standard can serve no useful purpose. There is no foundation for the premise that completion of a Bachelor of Science degree provides a concrete measure of an individual's initiative, ability or dexterity to be a reactor operator.

Completion of a college level program of specific technical education involving topics related to plant operation and the duties of the reactor operator would be more indicative of initiative and interest. It would also provide relevant expertise not guaranteed by a college degree. Moreover, such a limited program would be available to existing operators and could result in preserving the cadre of highly experienced and valuable personnel now involved in plant operation.

The loss of such personnel solely because they lack college credentials would cause unwarranted disruption to the industry. In addition, such a plan could be counterproductive to the safe operation of nuclear power plants since proper reactor operation requires in many cases dexterity and mechanical abilities unassociated with one's ability to obtain a college degree.

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In urging reassessment and further study of this issue there should be full communication with qualified members of the industry. I am confident their input would support these

This request should not be interpreted as a diminishment of the absolute commitment which the Power Authority and I have in maintaining the highest standards of quality and training to assure safe operation of nuclear power plants. To the contrary, it is because of this commitment that we urge that the Commission refrain from publishing SECY-81-84 since, in its present form, it results in a disruption of the concept of quality and safety in operating nuclear reactors.

Very truly yours,

John blyson John S. Dyson

Chairman