

YANKEE ATOMIC ELECTRIC COMPANY

Telephone 617 872-8100



1671 Worcester Road, Framingham, Massachusetts 01701

Denton
Dircks
Cornell
Rehm
Minogue
Shapar

June 9, 1981
FYC 81-83



Dr. J. M. Hendrie, Acting Chairman
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Chairman Hendrie:

As a follow-up to my letter of April 14, 1981 regarding the proposed rule set forth in SECY 81-84, the concerns I expressed have not been alleviated by Commissioner Gilinsky's modifications to that proposed rule (Commission meeting of May 28, 1981). While Commissioner Gilinsky's proposal would remove the unacceptable degree requirements for senior reactor operators ("SRO") and shift supervisors contained in SECY 81-84, it would establish in place thereof also unacceptable requirements for "college-level" technical courses as well as an additional license for shift supervisors. As discussed below, I submit that such requirements are unwarranted and may serve to reduce the level of safety of plant operations.

The sole justification or objective given by Commissioner Gilinsky for requiring "college-level" accredited courses for SROs and shift supervisors is to provide a "theoretical understanding" of basic principles related to nuclear power plant operation. Yet, an individual could satisfy these requirements (e.g., by receiving college courses in math and chemistry or a college degree in an engineering area not necessarily related to nuclear power) and still have little, if any, additional knowledge regarding the "theoretical" understanding of basic principles of nuclear plant operations. Commissioner Gilinsky's proposal clearly does not accomplish its intended objective.

If the Commission believes that current requirements do not adequately address these "theoretical" principles, the rational action is to require that prior to receiving a license, or prior to renewal of an existing license (in a phased program), that the SRO demonstrate in an examination the required level of understanding. In this manner, the Commission would have accomplished its intended objective while not restricting industry's options in providing the required training/education for SROs and shift supervisors or risking challenges to its regulations based upon discrimination theories.

With regard to another license of some sort for shift supervisor, it is not clear what gains are to be expected by this type of provision. The technical differentiation proposed between the shift supervisor and an SRO appear to merely add some more classroom time. The regulations already require certification for an SRO that "...the applicant's services will

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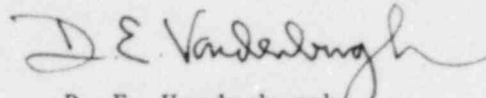
be utilized at the facility... to direct the licensed activities of licensed operators..." by an authorized representative of the facility license. There is overwhelming economic pressure for the utility to appoint only technically competent supervisors possessing substantial management skills to the position of, essentially, plant superintendent on shift. In view of the additional administrative burdens to both the NRC and to licensees, and the clear emphasis by all licensees on the importance of the shift supervisor position, there is little merit in any additional license or certification.

If Commissioner Gilinsky's proposal is adopted, I believe the resulting burden on existing SROs and shift supervisors (i.e., several years of off-duty college course work and possibly another license) will cause many qualified operators to leave the nuclear industry. Such an exodus may have a grave effect on safe plant operations.

Until the details of the NRC proposal are available, only general comments such as these can be offered. We plan to provide whatever detailed insight we can when the proposed rule is issued. I do urge that Commissioner Gilinsky's proposal be reevaluated in light of the foregoing before anything is adopted for publication as a proposed rule.

Finalization of any rule regarding operator training requirements should definitely await the completion of the job task analysis for RO, SRO, and shift supervisor currently being conducted by INPO. Without this information, any but the most general training requirements could be well wide of the mark. There is a wealth of information in this regard available from the Bell System Center for Technical Education in Lisle, Illinois. It may be of estimable benefit to have the NRC staff discuss development of training requirements with them before settling on a final rule.

Very truly yours,



D. E. Vandenburg
Senior Vice President

DEV/kab

cc: Commissioner Ahearne
Commissioner Gilinsky
Commissioner Bradford
Mr. E. P. Wilkinson, INPO
Dr. S. Hanauer, Director
Division of Human Factors Safety