

Washington Public Power Supply System  
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The Honorable J. M. Hendrie, Acting Chairman  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Chairman Hendrie:

Subject: QUALIFICATION OF REACTOR OPERATORS

I am deeply concerned about the NRC staff's proposed rulemaking on reactor operator qualification (SECY-81-84), which has recently been brought to my attention, and request that the Commission defer publication of that document until the staff and Commission have had the opportunity to understand the full implications of the proposals in it. At the outset, let me assure you that I, personally, and the Supply System as a company have committed to attaining the highest standards of quality and training for our plants' on-shift operating personnel. However, I would like to formally register my personal objections to both the approach and the content of SECY-81-84.

The rule changes proposed for 10CFR55 in SECY-81-84 are indicative of over-regulation through incorporation of excessively detailed and prescriptive requirements into federal law. If this proposal is issued at all, I suggest that it would be more appropriate to issue the document not as a rule change, but as guidance in the form of a proposed regulatory guide or a consensus national standard. In fact, such mechanisms are currently undergoing extensive review and modification. The second proposed Revision 2 of Regulatory Guide 1.8, "Personnel Qualification and Training," was issued for comment in September 1980, and the American Nuclear Society issued a draft version of ANS 3.1, "Qualification and Training of Personnel for Nuclear Power Plants," in December 1979. Clearly, the redundant efforts of issuing a cumbersome amendment to 10CFR55 would only confuse the situation and would not enhance safety.

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As to content, I am specifically troubled by the potential impact of the requirement that all senior reactor operators possess a bachelor of science college degree. I ask you to consider the ramifications of mandating such an overly simplified solution to the complex problem of upgrading the quality of on-shift personnel. The rule would essentially result in a disqualification of experienced, nondegreed personnel who represent a substantial portion of presently qualified senior reactor operators (who might not be willing or financially able to obtain a degree). In their place, the industry would be forced to hire inexperienced college graduates. Clearly such a result would prove detrimental to safe operation of nuclear power plants.

Finally, the justification provided in SECY-81-84 for the degree requirement is that it "serves as a measure of the individual's initiative to complete a comprehensive educational program." Although there may be some merit to this specious argument, surely it is not a matter which should form the basis for elevating the proposals to federal laws regarding nuclear safety. It should be noted that both the ACRS and an NRC consultant (Analysis and Technology, Inc., in NUREG/CR-1750, "Analysis, Conclusions, and Recommendations Concerning Operator Licensing") have expressed reservations regarding the BS degree requirement.

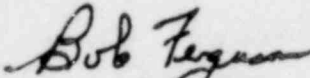
I understand that, despite the significant negative implications of the proposed amendments, the NRC intends to publish SECY-81-84 for proposed rulemaking. Since industry experience with NRC notice and comment rulemaking strongly suggests that proposed NRC rules are rarely materially altered based on public comment during the rulemaking, it appears that the requirements in SECY-81-84 may well become binding regulations in the near future. Such a result would be unnecessary, undesirable, and would detract from public health and safety. Accordingly, I request that you, as Acting Chairman, assure that additional staff study is devoted to this important matter and that input from qualified industry sources is obtained prior to publication of the proposed regulations. I am confident that such reflection by NRC and additional input from industry will cause the NRC to modify the proposed regulations in several aspects.

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I believe that what is needed to develop and attract higher quality on-shift operating personnel are some innovative approaches to upgrade the status of the senior reactor operating positions to provide a clear path to upper management. At the Supply System, we are pursuing development of an alternative which we would be pleased to discuss with the Commission.

Your consideration of this important issue is requested. I would appreciate a response at your earliest convenience.

Very truly yours,

  
R. L. Ferguson  
Managing Director