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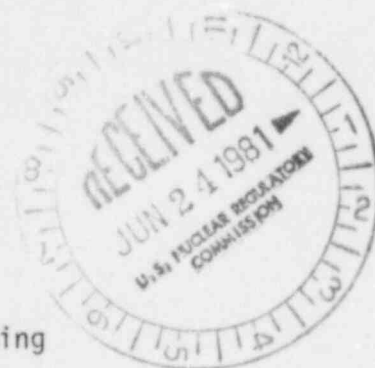
PACIFIC GAS AND ELECTRIC COMPANY

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J. O. SCHUYLER
VICE PRESIDENT
NUCLEAR POWER GENERATION

June 16, 1981

Dr. Stephen H. Hanauer
U.S. Nuclear Regulatory Commission
Washington, DC 20555



Dear Dr. Hanauer:

Operator Qualifications and Licensing
Proposed Rule (SECY 81-84)

On June 11, 1981, the Institute of Nuclear Power Operations (INPO) forwarded the following two letters for our review:

- 1) June 9, 1981, letter from W. J. Dircks (NRC) to E. P. Wilkinson (INPO).
- 2) June 9, 1981, memorandum from Commissioner Ahearne to the other NRC Commissioners.

Both of these documents pertain to new requirements for operator qualification, and INPO requested that we provide you with comments and suggestions on them. Accordingly, Pacific Gas and Electric Company offers the following comments and suggestions for the Commission's consideration:

A. Comments

1. Both Mr. Dircks and Commissioner Ahearne propose some form of degree requirement. The imposition of such a requirement, in our opinion, will not necessarily assure technical competence in those areas required for safe plant operation.
2. Degree requirements for operators will encourage poaching of personnel from other utilities, which could lead to instability in operating staffs and degradation of plant safety.
3. Degree requirements will tend to cut off career paths of operators, particularly older employees who would have difficulty in returning to college.
4. Partial implementation of degree requirements is not considered advisable (e.g., requiring degrees for new hires only). This would lead to salary inequities and divisions within operating staffs.

5. Rotation of engineers through operator positions should not be counted on as a method of meeting new degree requirements. For an engineer to function effectively and safely as an operator, he would have to obtain the same experience, training, and qualification as an operator.

B. Suggestions

1. To determine whether operators need to be upgraded in technical areas, a job task analysis (or similar analysis) should be conducted. Then, based on the results, one can determine if an individual has obtained the required knowledge through previous college work, military or commercial instruction, equivalent work experience, or if additional training is needed.
2. The NRC license and requalification exams should be used to determine whether operators have obtained, and are maintaining, a satisfactory level of technical competence in those areas necessary for safe plant operation. This will require revising NRC exams to improve their content validity and reliability, such as discussed in NUREG/CR-1750, "Analysis, Conclusions, and Recommendations Concerning Operator Licensing."
3. Since it is desirable to have some engineering expertise on shift, utilities should be given the option to use a shift engineer for this purpose, similar to the current Shift Technical Advisor (STA). The shift engineer would not be required to be an operator and thus would not have to devote the extensive time required for experience, training, and qualification as an operator. He should, however, complete a training program similar to the STA training program. In addition to providing engineering assistance on shift, the shift engineer position would serve as a valuable position for rotation of engineers on shift for relatively short-term assignments (2-3 years) which will help broaden the experience base of the engineering staff.

Sincerely,

