

NIAGARA MOHAWK POWER CORPORATION

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THOMAS E. LEMPGES
VICE PRESIDENT—NUCLEAR GENERATION

June 10, 1981



Dr. Steven H. Hanauer, Director
Human Factors & Safety Division
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue, Room P-518
Bethesda, MD 20014

Dear Dr. Hanauer:

The purpose of this letter is to provide comments on the proposal for rulemaking for 10CFR Parts 50 and 55, Operator Qualifications and Licensing.

I believe it is important to realize the impact on the utility personnel who presently are operating the nuclear facilities. The Nuclear Safety Oversight Committee in its letter to President Reagan on April 17, 1981, explained many of the problems and proposed solutions to these problems. I agree with their comment that ". . . regulatory schemes can never be a substitute for strong utility management . . ." With the establishment of INPO, the utilities are progressing to a higher level of training than in the past. I suggest that the NRC allow INPO to establish their program and then the NRC audit this program.

In discussing the educational requirements, it appears to me that the subject material is what is important, rather than a minimum number of semester hours in given subjects. The training courses supplied to the operators since the TMI accident, and even prior to, is comparable to college level engineering courses. It appears that if the present course material were reviewed, and deficiencies corrected, the operating people would be better qualified on the facility they were licensed on. An example of this may be the thermodynamic and hydraulic effects for vertical and horizontal heat exchanges. Some facilities have only one or the other. Therefore, the operator has no reason to learn about the other type. It is important to the operators to understand the effects of the various subjects on their specific operating plant, and this information can never be transmitted in a "generic" type of college course. I believe the

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industry would be better served by allowing INPO to accredit each utility training program rather than by regulating minimum acceptable college level semester hours.

The sections discussing shift supervisor makes reference to a new level of licensing. It appears the license would be issued without further NRC testing but based on utility certification. This appears to be an added burden when the NRC could audit the utilities' records for promotion.

Today essentially all shift supervisors have reached this position by working their way up through the operator ranks. These individuals have demonstrated their skillful abilities and deserve this promotion. Many of these same people have held an SRO for many years. Realizing this, and the amount of re-training they have had, and will have; I would propose that if the 60 semester hours or a graduated program allowing less than the 60 hours, is maintained, all personnel who have had an SRO for three years at a specific plant be exempt from needing the college credit. This should also include personnel who have had an RO for five years or more and have successfully completed the requirements and have been awarded an SRO since the licensing examinations have been expanded.

In reference to simulator training, I am a firm supporter of this type of education. I believe this is especially needed for operators of a nuclear facility as the high availability of these plants is not conducive to allowing power manipulations. However, to test an operators capability on a simulator that is not an exact duplicate, is really counter productive to that person. During an emergency condition on his own plant, an operator may revert back to his training on the simulator and make a mistake. If personnel are to be tested on a simulator, it should be an exact duplicate.

In summary, the nuclear industry is presently increasing the amount of training, in substance and in depth, that the licensed operators are receiving. The licensed people should become "experts" on the facility for which they hold a license. This is best achieved by a specific, regulated training program for each facility.

Cordially,

Thomas A. Lemper

TEL/JKR

cc: E. P. Wilkin