



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER  
VICE PRESIDENT - NUCLEAR

June 17, 1981

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



KMLNRC 81-088

- Ref: 1) SECY 81-84 June 9, 1981 Draft Revision  
2) INPO Letter dated June 11, 1981 on this Subject

Dear Dr. Hanauer:

This letter is being written at the request of Mr. E.L. Thomas of INPO to further impress upon the Commission our concern that the extensive college academic requirements for reactor operators that have been discussed by the Commission over the past year are not the most effective training program we could undertake to improve the qualifications of reactor operators. Our letter of January 19, 1981 (KMLNRC 81-054) on proposed Revision 2 to Regulatory Guide 1.8 discussed what we consider to be more desirable training requirements for Senior Reactor Operators and Shift Supervisors. We also expressed our opinion that implementing these college requirements will increase turnover and dilute the operational experience in the control room by either making people ineligible to continue in their jobs or denying them promotions. A program which results in less experienced people in the control room clearly does not enhance the safety prospects of the nuclear power industry.

Our letter of April 30, 1981 (KMLNRC 81-075) to the Commission commented on an extensive report by Analysis Technology, Inc., entitled "Analysis, Conclusions, and Recommendations Concerning Operator Licensing (NUREG/CR-1750)". This report was the most thoughtful discussion of this whole issue we have reviewed. It concluded that an engineering or B.S. degree was not necessary for a Shift Supervisor position and strongly urged that Job and Task Analyses be conducted for the Senior Reactor Operator and Shift Supervisor positions to determine if any college training was really necessary. The industry, under the auspices of INPO, is currently preparing these job and task analyses. It seems premature to impose these college training requirements prior to completing the task analysis work and having the industry and the Commission review this effort. The NRC has been urging, under the guise of a TMI Lesson Learned, that the

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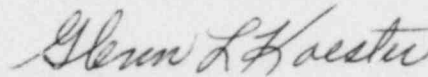
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the industry conduct this job and task analysis effort. However, we see no evidence in hearing transcripts on proposed 10CFR55 changes that the Commission is heeding its own advice when setting training and qualification requirements for operators. It is not clear to us how the Commission can justify an obvious sizable expenditure of public funds to prepare Report NUREG/CR-1750 and not address its conclusions in the rulemaking process.

We also noted with concern in the June 9, 1981 letter from W.J. Dircks to E.P. Wilkinson the comparison between the military and the nuclear industry. We very strongly feel that we should analyze the mission and requirements of our industry and not try to compare it to a dissimilar industry such as the military or airlines. Inherent in many military missions are remote operations removed from superior authority and technical support. This requires a different type of manning and discipline structure than is required in the civilian world in general. Commercial nuclear power plants are readily accessible by both on-site and off-site management for quick and continual support. We do not understand the basis for comparison between the military and the civilian nuclear industry. However, it should be noted that the Navy has had programs in which non-degreed enlisted personnel could advance from a Reactor Operator up to Engineering Officer of the Watch.

We appreciate the opportunity to present these comments and look forward to seeing the issues we have discussed previously being thoughtfully analyzed by the Commission and the staff prior to final rulemaking on changes to 10CFR55.

Yours very truly,



Glenn L. Koester  
Vice President - Nuclear

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cc: Secretary of the Commission, w/o  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

E.P. Wilkinson, INPO, w/o