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Carl Walske
President

June 10, 1981



The Honorable Joseph M. Hendrie
Chairman
U.S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Dear Chairman Hendrie:

The AIF Committee on Power Plant Design, Construction, and Operation, through its Subcommittee on Operations and Maintenance, has followed the development of the proposed rule described in SECY 81-84, "Qualifications of Reactor Operators," and the revisions thereto. From their review we offer the following comments:

- The proposed rule is premature and poorly conceived. The proposal appears to be based on conclusions drawn without the benefit of a thorough task analysis to determine the real need for specific levels of education, training, and experience. As currently identified in the proposal presented and reviewed at the Commissioners' meeting on May 16, 1981, the criteria and schedule of implementation will drive away from the industry a large percentage of the experienced operating personnel who are currently performing at a competent level. This will jeopardize rather than enhance safe operation.
- Efforts have been underway for some time between the industry, Institute of Nuclear Power Operations, and the NRC staff to identify a complete program of operating personnel selection, training, education, and experience that will assure well qualified operating personnel. This program will be completely accredited by INPO, both in content and instruction personnel.

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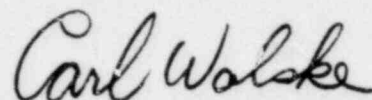
If the NRC proceeds through the rulemaking process, these efforts will have been in vain and, in our opinion, a much less qualified program instituted.

- If the Commissioners deem it to be absolutely necessary to publish a proposed rule at this time, we suggest it must contain the following flexibility:
 - Provide some arrangement to "Grandfather" existing licensed personnel at their present licensed position in the organization.
 - Determine the qualification criteria by thoughtful analysis.
 - Allow the technical education and training qualifications for the shift supervisors to be the same as for senior reactor operators. The difference in the two positions should be identified with decision making and management qualifications, not technical knowledge.
 - Provide realistic lead times to implement the rule for personnel assigned to both operating and near term licensees. This is necessary for the licensees to meet the identified criteria in a responsible manner.
 - Provide an interim option to the utilities for implementation, such as use of shift technical advisors.

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In summary, we urge you not to issue the proposed rule for comment. We are convinced that with proper direction to the NRC staff, the efforts that are currently underway will result in the establishment of a program of selecting, educating, and training operational personnel that will meet the intent of the proposed rule. This can be done through appropriate documents and in a timely manner without rulemaking.

Sincerely,



CW:bml

cc: Commissioner Ahearne
Commissioner Bradford
Commissioner Gilinsky