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Dalwyn R. Davidson  
VICE PRESIDENT  
SYSTEM ENGINEERING AND CONSTRUCTION

June 17, 1981

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



Dear Dr. Hanauer:

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

This letter is to comment on Commissioner Ahearne's version of SECY 81-84 dated June 9, 1981

The approach requiring nuclear plant operators at the RO and SRO levels to have a BS or BE degree could very well have a detrimental impact on long-term plant safety and reliability. Until industry job and task analyses are completed, which are expected to establish on a rational basis the training and educational requirements for adequately filling these positions, it is unwise and premature to mandate educational requirements that may not be necessary.

Detrimental long-term plant safety and reliability will come about due to reduced operation experience levels on shift as the degree requirement is imposed. The best non-degreed operators will not be content to fill the positions outside the control room with no further opportunity for advancement at a nuclear plant. The best qualified of these people will choose to advance through the utilities' other fossil plants which have need for highly skilled and motivated operators also.

Eighty man-years of effort is being currently invested in generic job and task analyses being conducted by INPO, utility, consultant and contractor personnel in addition to individual utility efforts. It is definitely premature to conclude at this time that all NRC licensed positions require the education suggested in the Commissioner Ahearne proposal.

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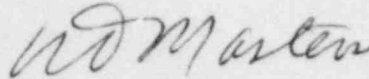
Dr. Steven H. Hanauer

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It is hoped that these comments will be considered in the formulation of the final rule and that stability in the operator license requirement is achieved.

Sincerely,



*for* Dalwyn R. Davidson,  
Vice President-System Engineering  
and Construction

DRD:JJW/ap

cc: Mr. E. L. Thomas  
Institute of Nuclear Power Operations  
1820 Water Place  
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