

AMERICAN ELECTRIC POWER *Service Corporation*



2 Broadway New York, N.Y. 10004

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June 10, 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:

Mr. E. P. Wilkinson's letter of June 3, 1981 requested industry comments on the Operator Qualifications and Licensing Proposed Rule (SECY-81-84). We have reviewed that document and have the following two comments:

1. Presently, we accept equivalency exams in meeting the high school completion requirement for operators and have no reason not to continue doing this. We believe that any individual who takes it upon himself to obtain a high school equivalency diploma has demonstrated at least as much motivation and self discipline as someone who completed a normal high school curriculum.
2. The requirement that Shift Supervisors have five years of responsible nuclear power plant experience, including two years of control room experience as a licensed senior operator for facilities that have yet to be operational will most certainly have a negative impact on currently operating facilities. The only logical place to acquire Shift Supervisors for new plants would be from existing plants. This requirement would further exacerbate the industry-wide problem of maintaining highly trained and qualified operators.

When the proposed rule is published for comment we will most likely provide additional comments through the normal channels. Should you have any questions on the above please let me know.

Very truly yours,

A handwritten signature in dark ink, appearing to read "R. W. Jurgensen".  
R. W. Jurgensen  
Chief Nuclear Engineer

RWJ:mm

cc: R. S. Hunter  
H. L. Sobel  
G. Gurican  
E. P. Wilkinson - INPO

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