



Institute of  
Nuclear Power  
Operations

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June 8, 1981

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Hanauer  
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OFR PDR?

Mr. William J. Dircks  
Executive Director for Operations  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Dircks:

The Institute of Nuclear Power Operations was provided with a copy of the May 27, 1981, Operator Qualifications and Licensing Proposal Rule (SECY 81-84). We have also had the opportunity to discuss the proposals with Drs. S. S. Hanauer and John Austin. Based upon those discussions and our internal review of the document, we offer the following comments for consideration.

While INPO does support the stated end result of SECY 81-84, improving the technical competence of plant staff, we feel that the mechanism proposed might not be the most appropriate method. There is difficulty in reducing education requirements to a set of rules, and it is noted that there is a considerable amount of research now in process which could change current views toward education requirement. Thus, to allow flexibility to reflect developing knowledge, it is suggested that a Reg Guide might be a more appropriate mechanism to achieve the end results rather than rulemaking.

As a general statement, we concur with the elimination of formal degree requirements for senior licensed personnel including Shift Supervisors (SS). While INPO believes that the technical knowledge of personnel at all licensed levels should be strengthened, we do not believe that the specifics detailed in SECY 81-84, namely an arbitrary number of semester hours credit, will achieve the desired upgrade or contribute to greater operating safety. SECY 81-84, as prepared, requires formal college level training in combination with operating experience. The experience factor is warranted. However, new training should be based on the requirement of the job and should include those technical subjects related directly to reactor plant operation with emphasis on improved understanding of the plant under abnormal conditions. This training could be provided by several methods of which college is an option.

An additional license for the shift supervisor would add additional complications without significant benefit. The additional administrative burden on the plant operating staffs,



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the utility, and the NRC seems unwarranted. INPO recommends that no distinction should be made in the technical education requirements of Shift Supervisors (SS) and Senior Reactor Operators (SRO's). Since the (SS) is higher in the organizational hierarchy, a deeper understanding of management principles, communication skills and understanding of administrative procedures would be involved.

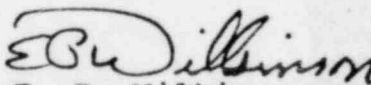
Given the present extreme shortage of operating experienced personnel in the industry, we support the exemption of current license holders from additional technical education requirements. Maintaining the highest experience level possible among operators is critical to safety.

We agree that those who will be operating tomorrow's plants in a more complex environment should have higher technical qualifications and we support the proposal that additional education is appropriate for future operators. We also agree that (SS's) in all plants should be better qualified technically but we urge that incumbents in this classification be allowed to upgrade in a timeframe consistent with maximum plant safety and availability of people.

We urge you to consider as a minimum a five year schedule to accomplish the additional training to provide the upgrade and maintain plant safety in the interim.

In summary, INPO concurs with the effort to improve operator qualification, but we feel that such must be done on a sound basis and within an achievable timeframe. INPO is eager to assist in any way possible toward achieving the desired results.

Sincerely,

  
E. P. Wilkinson  
President

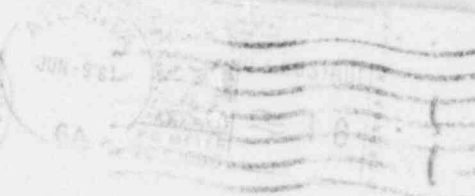
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cc: Dr. Harold R. Denton  
Dr. Stephen S. Hanauer



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