

# EDISON ELECTRIC INSTITUTE

The association of electric companies

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June 5, 1981



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

Dear Steve:

Thank you for the opportunity of providing early input to you and your staff regarding the NRC proposed rule on operator qualifications and licensing. We have reviewed the May 27, 1981 redraft of the proposed rule based upon SECY 81-84 as well as the material in the transcript of the NRC Commissioner's public meeting on this subject on May 28, 1981.

It is apparent to us that a new rule in this subject area is unnecessary and would probably be overly prescriptive. If, however, the NRC continues to persist in the establishment of a new rule, we will assist you in this effort.

At a working group meeting on June 2, 1981 held at INVO's offices, the attached items were developed which should be of use to you in your current staff deliberations. We recognize that you are working under a tight schedule and are transmitting these items as our initial thoughts and will continue to consider your needs.

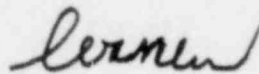
We strongly believe that any proposed rule must provide for a clear increase in nuclear safety and yet assure continued service from the currently qualified reactor operations people. These are not necessarily in conflict. The industry also feels that the dynamics of nuclear safety are such that continual re-training and, where necessary, more formal education, of reactor operations people is important as new experience is fed back to NRC and licensees. Accordingly, any proposed rule should provide for the steady upgrading of current and future reactor operators should the need for additional safety knowledge be identified.

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We will continue to maintain contact with you and your staff on this important issue and recognize that we have a common purpose; to assure the safe operation of nuclear power plants.

Sincerely,



Warren Owen, Chairman  
Nuclear Power Executive  
Advisory Committee

WHO:shd

cc: Messrs. William Dircks  
Harold Denton

COMMENTS ON PROPOSED RULE  
FOR  
OPERATOR QUALIFICATIONS AND LICENSING

MAY 27, 1981

1. There is no need for a separate license for shift supervisors.

A new category of licenses for shift supervisors is proposed. While specified requirements for tasks by shift supervisors may be of value, a formal license by NRC is not needed. It should be sufficient that each shift supervisor must be authorized and identified by the licensee as part of the facility license. Generally such persons are already so identified by licensee management and licensed as SRO's.

2. The technical knowledge required by the SRO and shift supervisor is the same; additional managerial skills are useful for the shift supervisor.

To supervise shift operations in a competent and safe manner, the shift supervisor is currently required to obtain a license as SRO. Utility management recognizes that persons assigned shift supervisor positions should also possess management skills not needed by SRO's.

3. Shift supervisors may be designated as persons having college education including degrees or persons from the ranks of SRO's who have moved upward within reactor operations. Each shift supervisor must have an SRO license in either case.

Utility management should have the option of either promoting licensed SRO's to shift supervisors (assuming recognized added management skills) or utilizing persons with more formal education and an accelerated plant experience in reactor operations; either option requiring the individual to have the SRO license. The type of accelerated plant experience and the general duration need to be defined.

4. The current interim requirement for Shift Technical Advisors should be phased out.

Although not addressed in the proposed rule, as SRO's and shift supervisors obtain sufficient additional technical training and/or education, the current interim NRC requirement for a separate Shift Technical Advisor can be phased out. However, a utility could retain this at their discretion.

5. All persons currently holding valid RO and SRO licenses should be permitted to retain licenses, without imposing special added training or educational requirements. Movement upward will require added technical knowledge.

Current holders of valid RO and SRO licenses are receiving added training reflecting important lessons learned from the experience at Three Mile Island and elsewhere. Such training includes plant-specific and generic safety topics. In addition, each RO and SRO must meet annual requalification criteria. Accordingly, current RO and SRO licensees should be permitted to continue to hold valid licenses without the need to meet special added training or educational requirements provided they elect to remain in current positions at specific units for which they hold licenses, subject to annual requalification.

- a. Current RO's and SRO's should meet specific added technical training and educational requirements only when applying as candidates for higher operating positions.
- b. On an interim basis, incumbent RO's applying as candidates for SRO licenses, should meet the present SRO level of technical competence as determined to be possessed by incumbent SRO's at the time of the

effective date of the rule.

6. The optimum level of technical knowledge (training and education) required by licensed RO's and SRO's to achieve safety goals within a reasonable time need to be identified.

The proposed rule offers one option as to the optimum educational levels needed to be achieved by RO's and SRO's to maintain valid licenses. In the absence of final determination by industry standards groups or by INPO of task-related standards of knowledge necessary to perform RO and SRO duties in a competent and safe manner, specific numbers in an NRC rule should be omitted. INPO and others are diligently working to define the appropriate applicable criteria for measuring achievement of such knowledge. Initially the present level of technical knowledge possessed by incumbent RO's and SRO's should be identified. The optimum level of technical knowledge should also be identified, understanding that this level will be continually changing as new safety information is developed.

All incumbent shift supervisors should meet the optimum level of competence for SRO's within five years of the effective date of any NRC rulemaking on this topic.

7. The proposed rule does not adequately address the needs of near-term operating licenses for reactor operations personnel.

Since new plants cannot provide operating experience for operating personnel, a system to recognize training programs or previous operating experience elsewhere will be needed to assure an adequate station complement of licensed RO's and SRO's and designated shift supervisors.

General

The revised draft of the proposed rule includes, in addition to the text of the rule starting on page 19, Supplementary Information which in large part is unnecessary. Industry comments on the initial proposals in SECY 81-84 called attention to excess verbage. An example is the statement on page 14, line 17, that "A degree serves as a measure of an individual's motivation and perserverance." Our present comments have not considered and identified all such unnecessary and controversial statements, however, NRC staff is urged to exercise restraint in the preparation of the section on Supplementary Information to include only pertinent and noncontested statements. Urgings of the Commission addressed to utilities on future reactor operations or management personnel needs can be better handled outside the text of a proposed rule narrative.