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DOCKET NUMBER
PROPOSED RULE
PR-50
(47 FR 38135)

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Chilk:

Subject: Proposed Rule on Licensed Operator Staffing at
Nuclear Power Units--10 CFR Part 50

The staff of GPU Nuclear Corporation herewith submits comments on the subject proposal. Comments were requested in an August 30, 1982 Federal Register notice (47 FR 38135).

Proposed Section 50.54 (m)(2)(i):

Due to the difficulties that many utilities face in obtaining qualified people, and the time lags associated with properly training and licensing operators, particularly Senior Reactor Operators (SROs), we urge that the effective date for this rule be established as January 1, 1984. In the interim we recommend that each utility be required to either meet the specified staffing levels or demonstrate "good faith" efforts to attain those levels by January 1, 1984.

Proposed Section 50.54 (m)(2)(iii):

We urge that this requirement be modified to allow core alterations to be supervised by a Senior Reactor Operator or a Senior Reactor Operator Limited to Fuel Handling. This would provide a measure of flexibility in dealing with staffing problems but would not decrease safety. It would also make this regulation consistent with the NRCs Standard Technical Specifications (STS) and the technical specifications for the majority of operating plants.

Sincerely,

John R. Thorpe
Director
Licensing & Regulatory Affairs

DS/0
Add to Maschoff
5650

JSW:dls

cc: Mr. Richard Jacobs, NRC
Mr. James Lombardo, NRC

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