

DUKE POWER COMPANY  
P.O. BOX 33189  
CHARLOTTE, N.C. 28242

HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

September 24, 1982  
SEP 30 11:30

TELEPHONE  
(704) 373-4531

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

*emp*

Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Docketing & Service Branch

SECRET NUMBER  
PROPOSED RULE

15  
PR-50  
(47 FR 38135)

Subject: Licensed Operator Staffing at Nuclear  
Power Units; Proposed Rule

Dear Sir:

Duke Power Company wishes to comment on the subject proposed rule as published in the Federal Register, Volume 47, No. 168 dated August 30, 1982. Clearly, this proposal represents another attempt by the Commission to legislate unnecessary requirements in the guise of safety enhancement with apparent disregard for practicality or the impact upon the utilities that must comply. In a broader sense, the Commission has also failed to adequately consider the impact on the industry in general of the proposed January 1, 1983 implementation date.

In assessing the impact of this proposed rule on Duke Power's Oconee Nuclear Station, for example, it is our estimation the new regulation would require five additional personnel licensed as senior reactor operators (SRO's). The economic impact of this additional manpower over the life of the station, at a time when utility costs are under close consumer scrutiny, is not justified by any significant increase in safety.

It is unreasonable to assume the five SRO's cited above could be qualified, examined, and licensed by January 1, 1983. Training SRO candidates is a time-consuming process. The training program at Duke Power, which is presumably representative of the industry in general, requires between six months and four and one-half years to qualify and license SRO's; depending on the previous experience and qualifications of the candidate. Clearly, utilities who do not now meet the proposed requirements are likely to be in violation if the rule becomes effective in three months. This further illustrates the unreasonable time frame this rule imposes and the degree of inflexibility being mandated by the Commission.

Should this rule be implemented, Duke Power foresees competition arising among the nation's utilities to attract sufficient numbers of SRO's from an already limited supply of qualified personnel. This further illustrates that the Commission has not fully considered the impact of this rule on the industry as a whole and has not provided sufficient flexibility for meeting these requirements.

*DS 10  
add: E. Merschhoff  
5650 NL*

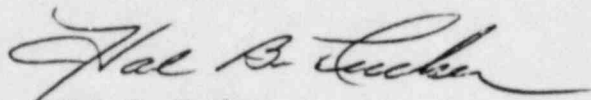
8210130599 820930  
PDR PR  
50 47FR38135 PDR

*10/7/82 emp*

Secretary of the Commission  
September 24, 1982  
Page Two

Duke Power recommends that the Commission reevaluate the real need and impact of the proposed rule. The rule does little to improve safety; current requirements for SRO's, Shift Supervisors and Shift Technical Advisors ensure that an adequate aggregation of technical and operating expertise is available at all times. Simply to require that an extra SRO be available in the control room is a waste of resources. Even if an SRO needs to leave the control room, for instance to attend to other duties in the plant, he can still be recalled to the control room if needed, or consulted via phone. On multi-unit plants, the need for an extra SRO is diminished even further by the presence of a second or third unit's SRO. In conclusion, it is the feeling of Duke Power that current staffing requirements are adequate to ensure safe operation of our nuclear plants.

Very truly yours,

A handwritten signature in cursive script, reading "Hal B. Tucker". The signature is written in dark ink and is positioned above the typed name.

Hal B. Tucker

JSW:scs



**SMUD**

SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, Box 15830, Sacramento, California 95813; (916) 452-3211

*see 5*

September 24, 1982

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

DOCKETED  
USNPC

SECRETARY OF THE COMMISSION  
U S NUCLEAR REGULATORY COMMISSION  
WASHINGTON D C 20555

'82 SEP 30 11:35

ATTENTION DOCKETING AND SERVICE BRANCH

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

DOCKET 50-312  
RANCHO SECO NUCLEAR GENERATING STATION  
UNIT NO 1  
PROPOSED CHANGE TO 10CFR50.54

The Sacramento Municipal Utility District proposes that the comments in the following discussion be seriously considered prior to the NRC acting on the proposed change to 10CFR50.54 as published in the Federal Register, Volume 47, No. 168 of August 30, 1982. This letter is a correction to a previous letter dated September 17, 1982.

All operating nuclear power plants are required to operate and staff within the requirements of the Technical Specifications issued uniquely for each plant. The Technical Specifications provide flexibility for the NRC to consider unique features at each facility when establishing minimum conditions for operation. Historically, the Technical Specifications have established the minimum staffing requirements for a particular unit and the requirements have frequently been more restrictive than the law required. There is absolutely no need to become prescriptive within the law to the working location of personnel ( proposed 10CFR50.54 (m)(2)(ii) and 10CFR50.54 (m)(2)(iii) ) nor the deadline for establishing staffing levels ( proposed 10CFR50.54 (m)(2)(i) ). To do so, removes the flexibility to consider other alternatives and may penalize a utility which has made good faith efforts to comply with the wide range of uncoordinated guidance recently issued by the Commission. This guidance includes staffing levels, experience requirements prior to licensing and overtime limits.

The Darrell G. Eisenhower letter of July 31, 1980, discussed Interim Criteria for Shift Staffing. The District's response to that letter dated November 3, 1980, established two realistic schedules for meeting the criteria. One schedule optimistically assumed no attrition and projected a compliance date of November, 1983. The other schedule provided for a more realistic 30% attrition and provided for a compliance date of June, 1985. The NRC made no response to the schedules and the District proceeded accordingly with staffing actions. On January 15, 1982, the NRC letter from John F. Stolz, again requested the District's schedule for meeting the Interim Criteria for Shift Staffing. The District reiterated the same schedule by letter dated

*DSID  
add: S. Murchiff  
5650 NW*

Administrated by card. *10/7/82 emp*

February 11, 1982. The proposed rule change completely disregards the District's previous responses and fails to recognize that operating personnel cannot be licensed "overnight".

Historically, the District's Operator Licensing Program has been deliberate and extensive. Normally, a qualified candidate spends a minimum of eighteen to twenty-four months as an unlicensed operator in the plant prior to beginning reactor operator training. The license training program then takes approximately sixteen months to complete. In addition, the NRC has imposed a one year experience requirement as a licensed reactor operator prior to taking the Senior Operator Examination, and the District's upgrade training program for Senior Operator requires approximately seven months. Candidates put up for licensing by the District have been 100% successful in passing the NRC examination on the first attempt under the post-TMI 80%-70% criteria. This is in stark contrast to the experience of many other utilities. We firmly believe that any attempt to speed up the District program can only lead to adverse safety implications for the General Public.

IE Circular No. 80-02, of February 1, 1980, established overtime guidance to assure that operating personnel are physically prepared to stand a competent duty. The District, as a result of this guidance, has committed to establish a six-shift rotation to minimize overtime and in particular, to eliminate the requirement to conduct training on an overtime basis. As a result of industry's commitment to INPO, the required operator requalification program has expanded, making the nonovertime training goal even more important. This commitment to six shifts was enhanced by INPO comments resulting from the 1981 audit and more recently by an outside consultant review conducted as a commitment given to the NRC Regional Director during an enforcement conference. This six-shift rotation commitment would have to be delayed for many months if a requirement is made to increase the licensed operator staffing per shift in 1983.

Discussions with other utilities indicate that many other plants would have to meet the increased shift staffing by scheduled overtime and by less than six shift rotations. In light of industry experience and IE Circular No. 80-02, this action seems contrary to the best interest of safety. It would seem that if in fact utilities do take these steps because of the proposed rule change, the NRC is guilty of enforcing one requirement without thoroughly evaluating its resulting impact on other guidance the industry is trying to meet. Here is an excellent example of how a rule change removes flexibility which the Technical Specifications allow.

Amendment No. 31 to the Rancho Seco Operating License prescribed in the Technical Specifications that a Shift Technical Advisor (STA) be available to shift crew personnel. The District has embarked on a training program to license Shift Technical Advisors currently on staff. This program, voluntary in nature, is being pursued as a means of strengthening the overall capability of the operating crew and support staff. Two of the District's STA's are currently licensed as Reactor Operators and four others are in training with an anticipated licensing date of March 1, 1983.

A final comment that should be considered deals with a serious situation which the NRC guidance has caused. The proposed rule and earlier guidance is promoting personnel piracy within the industry.

Enclosed is a letter that has been sent directly to the homes of numerous District employees. This is typical of several such piracy attempts which are known to District management. In addition, the local media in areas where experienced nuclear personnel are concentrated as well as industry publications are commonly used to advertise opportunities. The direct home mailing generally comes about from concentrated programs aimed at particular individuals. In the case of the example we have enclosed, we feel that it represents recognition that the District has acquired and trained excellent operating personnel. However, it also illustrates the extent to which some hiring firms will go to meet their employer's requests. These requests are undoubtedly a direct result of the NRC's mandated staffing requirements and the proposed deadline dates which we fear are to become law without benefit of seriously looking at each facility's unique situations. What is particularly distressing about this solicitation is that the salary offers from the investor owned utility sponsoring the recruiter exceed the District's salary structure by 15%-32%, and the license bonus by 43% or more. Since the District is municipally owned, it has many of the same type of fiscal restraints and public responsibilities with respect to salary and benefits with which U.S. Federal organizations are faced.

It should also be pointed out in this context, that piracy of licensed personnel actually decreases the supply of licensed operators at U.S. Nuclear power stations. Not only do many of these individuals leave the utility industry, many that join other utilities do so in nonshift operations capacities. Even those licensed personnel who join a new utility to remain in shift operations are removed from licensed duty for one to two years while they train and license on the new facility.

If due consideration is given the above comments, the District is confident that the Commission will see the merits in dealing with power station staffing levels and deadlines for those levels on a case by case basis and rescind the proposed change to 10CFR50.54. The Technical Specification conditions for operation certainly provide for establishing Commission requirements and at the same time provide for much more flexibility than does the proposed rule change.

  
John J. Mattimoe  
General Manager

Enclosure

cc: R. DeYoung  
J. F. Stolz



# VARO AND LUND CORPORATION

CONSULTANTS TO MANAGEMENT ON DOMESTIC AND INTERNATIONAL EXECUTIVE SELECTION

Our firm is providing consulting services to \_\_\_\_\_, the largest power producer in \_\_\_\_\_ is in the midst of a very major nuclear power expansion and will shortly be bringing \_\_\_\_\_ MWe on stream. The difficult and frustrating period of licensing, hearings and construction is essentially completed. This expansion and their plans for the future have opened key career opportunities, which we would like to discuss with you.

\_\_\_\_\_ is one of the \_\_\_\_\_ largest investor-owned utilities in the U.S. and has an excellent reputation in the community at large. It has low employee turnover and a firm commitment to promotion from within. The warm, sunny climate here in \_\_\_\_\_ provides an ideal setting for working, living and outdoor activities. We want to attract an experienced individual who is excited by new challenges and really enjoys being involved in nuclear plant operations or in the engineering, safety or health physics aspects of nuclear power generation.

I have attached specific information on some of these career opportunities and starting salaries for your consideration. Also described is the excellent relocation program and comprehensive company benefits. If you would like to explore this career situation further on a confidential basis, I would be pleased to receive a copy of your resume or simply a handwritten outline of your background and experience. There is obviously no financial obligation on your part. After it arrives here, we will get back in touch with you to discuss the situation further and answer any questions you may have. However, if you would prefer to first discuss the situation by phone, please call collect at 213/469-3109.

If this opportunity is not of interest, I would be pleased if you would discuss this with others who might like to investigate this situation.

Sincerely,

VARO AND LUND CORPORATION

J. Kenneth Lund  
Senior Vice President

JKL/rb1



VARO AND LUND CORPORATION  
Consultants  
1800 North Highland Ave.  
Los Angeles, CA. 90028  
213/469-3109

NUCLEAR CAREER OPPORTUNITIES AT

is a large investor owned utility providing electric service to a 500,000 square mile area. Peak generating capacity in 1981 totaled over 13,000 megawatts (MW). During the next two years, MWe of new nuclear power will be added. One of two new pressurized water reactor (PWR) nuclear plants is about to go into full power testing. Construction of the second is almost complete. In addition to nuclear and fossil fuel-fired generating units, is deeply involved in developing alternative and renewable energy sources such as hydroelectric, cogeneration, wind, geothermal, solar and fuel cells.

LOCATION

Corporate headquarters and staff departments are located in a "campus" setting in a suburban area. The nuclear power facilities and operations staff are situated

CAREER OPPORTUNITIES

There are selected openings in the Nuclear Engineering and Operations Department, described below. In essentially all cases there is a need for more than one individual in each position. The starting salaries are attractive and are more than competitive. Depending on background and experience, they can go up to the numbers shown below.

in plant Operations, there is a most important need for ASSISTANT SHIFT SUPERVISORS, requiring either a Senior Reactor Operator (SRO) license with PWR experience or non-SRO license with PWR navy nuclear experience. Starting salary can go up to \$41,000 plus a yearly bonus of \$6,000 if you already have an SRO license, or a yearly bonus of \$4,800 if you already have an RO license.

Another important position is that of COORDINATOR. Responsible for directing and coordinating programs on equipment status and outage control, and providing technical support to ensure optimum plant performance, maintain compliance and safe operations. Requires at least four years of nuclear operating experience. Although not required, an SRO or RO license, or nuclear navy experience at the engineer officer or E00W level, would be a strong plus. Starting Salary can go up to \$41,000, plus a yearly bonus of \$6,000 if you already have an SRO license, or a yearly bonus of \$4,800 if you already have an RO license.

In Engineering and support divisions, there are the following important positions. The starting salary of each can go up to \$46,000 for highly qualified and experienced individuals. LICENSING ENGINEER involved in establishing design criteria for all nuclear work and working closely with the NRC. Requires a B.S. or M.S. in nuclear, mechanical or electrical engineering plus at least several years of nuclear power plant experience or Navy nuclear trained officer experience.

SAFETY ENGINEER involved in preparing and maintaining plant safety and environmental specifications, monitoring plant performance, recommending modifications, etc. Required background is similar to that for the LICENSING ENGINEER.

COMPLIANCE ENGINEER to coordinate regulatory-related activities with NRC inspectors and the staff, and implement regulatory requirements. Requires a B.S. degree in engineering, science or related discipline with experience in licensing or commercial nuclear operations.

CONFIGURATION CONTROL ENGINEER to establish and maintain a large scale computerized system for technical information storage, update and retrieval. Requires degree in engineering or computer science and experience in configuration control in either power plant operation, aerospace, shipbuilding or heavy construction. Applicable military or government experience may be acceptable.

FIRE PROTECTION ENGINEER to establish and maintain fire protection/suppression, fire hazard analysis and prepare emergency preparedness procedures. Requires degree in mechanical, nuclear or fire protection engineering, or related field plus solid experience.

STARTUP ENGINEER to prepare pre-operational and initial startup testing, conduct start-up tests and evaluate results. Requires degree in nuclear, mechanical or electrical engineering plus at least several years experience in a recent nuclear startup program or plant operation.

HEALTH PHYSICS ENGINEER to advise on the radiation protection program, participate in audits and reviews, and assist in the respirator protection, dosimetry and radiation waste programs and materials control activities. Requires degree in health physics, chemistry, nuclear engineering or related discipline plus experience in nuclear operation radiation programs.

NUCLEAR TRAINING INSTRUCTOR which requires technical instruction experience and either a PWR-SRO license or a BWR-SRO license with PWR experience, or a "certified" SRO in PWR or BWR. Starting salary for this position can go up to \$40,000.

#### RELOCATION

There is an excellent relocation program which includes a "home purchase" plan. In essence, we will buy your current home and pay closing costs on that home and the new one you purchase, and will pay a generous portion of any increased mortgage interest payments for the first three years of your employment. The cost of moving, a house-hunting trip and up to \$2000 of miscellaneous expenses on moving into the new home will also be paid for.

#### COMPANY BENEFITS

There are comprehensive and excellent company benefits, including life, medical, dental and disability insurances, a stock purchase plan with company contribution, vacations and 12 paid holidays, and a company-paid retirement plan.