Dear Mr Chairman -
Some really poor regulations are being proposed while you are in the hospital. Please check on them when you get better.
Marion -

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

emp

Secretary of the Commission
USNRC
Washington, D.C. 20555

Dear Mr Secretary,

Please accept the following letter as my comments on the Proposed Regulation on Staffing at Nuclear Power Plants.

My first comment is that if this regulation is not a disaster it can lead to one. The way the News Release reads the regulation can be interpreted to mean that , in a twin or dual reactor sharing the same control room , there can be 2 Senior Reactor operators (SRO) and 1 reactor operator present when both reactors are operating. This means that there will be two chiefs and 1 Indian. This is a potentially hazardous situation. It will also lead to the RO not knowing which SRO's orders he is to follow. Under some conditions , the RO would be in the position of being wrong no matter whose orders he tries to obey.

This could lead to the condition wherein the SRO would believe that an order had been followed when the RO had not had the chance to comply as yet. Under emergency conditions , this lack of compliance will lead to more TMI#2 accidents.

Secondly, the regulation proposes a minimum for a nukes. Surely there are some nukes with outdated control rooms, specail problems like gages on the back of consoles,that will require more than the minimum. This type of exception is not allowed by the regulation. Some wording must be incorporated in the proposed regulation to demand greater than proposed staffing for those nukes that will and do need it.

Finally, there must be some way of allowing intervenors to protest this regulation for cause in licensing hearings.

Respectfully submitted,

Marvin Lewis

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Acknowledged by card 9/28/82 emp