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USNRC

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

September 26, 1982

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

DOCKET NUMBER

PROPOSED RULE

(25)
PR-50
(47 FR 38135)

ATTN: Docketing and Service Branch

RE: PROPOSED RULE CHANGE 10 CFR 50 - LICENSED OPERATOR STAFFING

Dear Sir:

The rule as proposed lacks a true applicability to the criteria of TMI lessons learned. The goal was provide a minimum level of shift staffing to ensure proper attention to plant controls. The proposed rule totally ignores the complexity range of different facility and the human factor issue of size of control room. The proposed rule indicates a lack of understanding in the manpower requirements to operate different types of power plants.

The proposed rule is more than adequate to handle normal operating and post-accident situations at large pressurized water reactors. It, in my opinion is a very conservative approach to that situation. I have been licensed as a Senior Reactor Operator on two large pressurized water reactors.

If the same rule is applied to small simple cycle boiling water reactors it exceeds the manpower requirements to safely handle the same events by one individual.

As the Atomic Energy Act requires the U. S. Nuclear Regulatory Commission to provide an equivalent degree of protection to the public around each reactor, if this rule is imposed crew size would have to be raised for larger PWR's. The author of this proposed rule has failed to take this factor into account, therefore, opening the U. S. Nuclear Regulatory Commission up to possible litigation by citizens living near the more complex facilities.

Having also been licensed by the Nuclear Regulatory Commission as a Senior Reactor Operator on a boiling water reactor - the difference in complexity and equipment inventory are apparent. As a graduate nuclear engineer, I feel the staff size for comparable actions to those defined in the proposed rule at a small (<250 MWT) BWR should be 3. It is apparent that the shift supervisor, a licensed SRO is free to roam about the facility (that's the basis for a second SRO being added) and he can direct an unlicensed operator in taking tours, checking valve lineups, etc. The two SROs plus one RO are also a very sufficient crew size for providing relief.

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add: E. Merschoff
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acknowledged by card. 10/18/82 [signature]

September 26, 1982

One thing overlooked by the NRC is the presence of the Shift Technical Advisor (required previously under another rule). He/she also represents management level advice and direction in addition to the two SRO and one RO, I propose in lieu of your rule.

Comments address to Commissioner Asseltine

The implementation schedule in the proposed rule is not realistic. It will result in "rush up and get licensed" actions by many licensees. Individuals with extensive operating experience realize that achieving an NRC license is only the first step in upgrading. A rush job puts under-qualified people in control of nuclear reactors. While this may look good as a public posture, it is a true degradation of reactor safety. We have adequate staffs now to operate our plants safely, but these underqualified personnel (added just for accident situations) cannot be prevented from touching the controls during normal operation. Thus, more chances for accidents to be initiated occur.

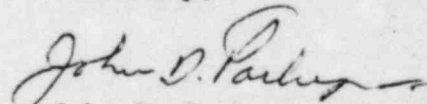
Consider the timing. Until Fall of 1979 a typical single unit nuclear plant was required to have 2 licensed (one SRO, one RO) or professional people on staff. Now by this rule you are requiring 5 (2 SRO's, 2 RO's and 1 STA) all in a very short span of time. Think of the decrease in quality.

Also, consider that during this period you assigned 2 Resident Inspectors to each plant (and hired these people away from the same pool of manpower). The Institute of Nuclear Power Operations also was created during this time and staffed up. The U. S. Navy has raised enlistment bonus and retained more people.

The resulting situation is extremely unhealthy. The end result is to expose the American people to a risk by a reduction in the degree of safety in day-to-day operation all based on the hypothesis that the tiny increment of gain if another TMI occurs will be worth it.

Please roll this implementation date back.

Sincerely,


John D. Parkyn

JDP:eme