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October 22, 1982

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

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

Attention: Docketing and Service Branch

Subject: 10 CFR Part 50, "Licensed Operator Staffing at
Nuclear Power Units"

Dear Sir:

The Atomic Industrial Forum's Committee on Power Plant Design, Construction and Operation has reviewed the proposed rule 10 CFR Part 50, "Licensed Operator Staffing at Nuclear Power Units" which was promulgated in the Federal Register (47 F.R. 38135) of August 30, 1982. We offer the following comments for your consideration.

We believe this rule is inappropriate at this time because it is not in concert with the NRC Staff's integrated plan for shift crew qualifications. Presently, the operating reactors are required to have a Shift Technical Advisor (STA). The Peer Advisory Panel, commissioned by the NRC, has recommended to the NRC that the STA be replaced with a "Shift Engineer" certified as a Reactor Operator (RO). However, the Peer Advisory Panel did not consider a second SRO qualified for each unit as the proposed rule would require. We believe it would be prudent to determine the need for complete staffing justified by an appropriate analysis and then proceed with the definition. The NRC Research Office and the Institute of Nuclear Power Operations (INPO) are performing such job-task-analyses which should be used as major inputs for any rulemaking on operator staffing.

We believe that the licensing agreements for each operating plant are adequate to assure safety until such time as the broader rulemaking on shift crew qualifications is completed. We, therefore, recommend that the proposed rule on operator staffing be delayed and folded into the broader rulemaking at the appropriate time.

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Sincerely,

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