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October 5, 1984
1031 Nuclear Road
Mishicot, WI 54228

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Dear Mr. Denton:

I am addressing this letter to you directly and not to one of your staff personnel. I would ask that you please read it and respond to it in the same sincere and honest manner that I am writing it.

I presently hold an SRO license which I have held for the past 12 years and hold the position of one of the Duty Shift Superintendent's at the Point Beach Nuclear Plant. I would like to pose some questions to you and ask that you consider what your answer to each might be.

First of all, I'm sure that you are a degreed person and I would like to ask how long ago it was since you passed the required examinations to obtain your degree? If you were asked to retake those exams today, would you be able to obtain a passing grade?

The next question is, if you were to try to maintain that same knowledge level, how much of your time would it require each year to do so? In doing so, would the time and effort spent have kept you from accomplishing the tasks required to perform your job, or would you have even had the time to get where you are today?

This can be applied to a doctor, pharmacist, pilot, engineer and I guess all the professionals today. They are all very much more knowledgeable and proficient in their field now than when they took their initial exams that got them into their particular line of work. This is surely not because they are doing as my questions previously suggested because in so doing they would have missed out on much of the invaluable experience gained in performing the various tasks of their everyday job in a real world. Granted they must stay up-to-date with changes that take place and that part I fully agree with.

All of these technical people have at their disposal the various books, data, and files of information that they at one time had to learn but do they even attempt to trust it to memory. No, because there is a much more efficient way to keep themselves proficient. As an operator I'll be the first to admit I refer to the books quite often whether it be Tech Specs, Procedures or whatever because today as complex as everything is getting, as soon as you trust everything to memory, your asking to make just that many more mistakes.

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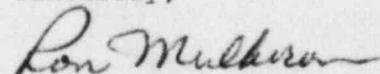
You know as well as I do there are many people in this world who are what one could call a professional exam taker. They can apply very little of what they write about on an exam but boy can they memorize. I get the feeling these are the type's of people the industry will be forced to go with because of how things have gone these last few years and it is a bit frightening. More and more good operators are giving up and taking there many years of experience with them to some other line of work because of the reasons talked about. These years of experience cannot be replaced by someone who knows how to take an exam.

I ask then, why we as licensed personnel are being subjected to these measures? In doing so it is going to require and I might add is requiring a considerable amount of time to be spent not concentrating on my real responsibilities as a DSS/SRO, but studying to satisfy a requirement that accomplishes very little. In fact, it is seeming to have a negative effect. More and more good, knowledgeable, experienced personnel are looking at these latest requirements and leaving the ranks rather than be the sacrificial lambs. Why should we have to lose our experienced personnel in this way?

The reason I ask these questions directly to you Mr. Denton is because no matter who we as operators ask, whether it be our upper management or they ask the NRC officials, the answers always come back to the effect, "There is nothing I can do about it, I'm only following the guidelines set down by the NRC." Someone somewhere has to be above this hand washing level who can provide some real insight to these issues. For fourteen years I felt a sense of accomplishment performing my duties as RO/SRO but these last few years as these new examining procedures unfold, I find it increasingly difficult to have a desire to stay with the program. I know I speak for most all the operators I work with as well as many throughout the country.

As you may well have guessed by now, I am designated to take a full SRO written exam in November of 1984. Going back to those questions I asked you previously, I ask you how you think I feel with this hanging over my head each year? Would you take those college exams each year and not try to get some answers or see if those making the rules have really thought that deep into the situation? If I thought it was an effort that would accomplish something besides satisfy another federal requirement, it might be a little different, but we as operators find very little positive value in it for us or the nuclear industry. It seems quite obvious to us these regulations are handed down by people who have a minimum understanding of what a Nuclear Operations Department is really all about.

Sincerely,



Ron J. Mulheron
Shift Superintendent
Point Beach Nuclear Plant