

UNITED STATES NUCLEAR REGULATORY COMMISSION

OFFICE OF THE COMMISSIONER

June 14, 1984

The Honorable Morris Udall, Chairman Subcommitee on Energy and the Environment Committee on Interior and Insular Affairs United States House of Representatives Washington, D.C. 20515

Dear Mo:

I regret I will not be able to attend the Committee's briefing on Diablo Canyon. I would like to submit for the record some brief comments on NRC's disregard, in approving the plant's operating crew, of the experience requirements in the regulations on operator gualification. None of the Diablo Canyon operators have had previous experience operating a comparable plant.

I say "disregard" because, after being told, by the General Counsel that staff practice, in allowing completely inexperienced crews to qualify on simulators, was at odds with the plain meaning of the regulations, the Commission did not even bother to grant exemptions. It simply went right on and issued instructions that the embarrassing regulation was to be expunged as quickly as possible. I have attached my separate views on that action.

Unfortunately, disregard of regulations that stand in the way of licensing plants, is becoming a habit, with the Commission.

Sincerely, Victor Gilinsky

Attachment: As stated

cc: Rep. Manuel Lujan./

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The Commission is being more than a little disingenuous in implying that its principal concern is "to update its operator licensing regulations and related regulatory guides to clarify the increasingly important role which simulators play in the training and testing of reactor operators." Moreover, it is preposterous for the Commission to claim that the Congress and the public have long been aware that the staff's licensing practice -- in ignoring experience requirements for operators of new plants -- is at odds with the regulations.¹ The fact of the matter is that the Commission itself did not know this until a few weeks ago. Even the senior staff was unaware of it.

Unfortunately, in its scramble to patch up its operator licensing system, the Commission is throwing the baby out with the bath water. The healthy effect of the existing rule is to require that the operating crew that brings a new reactor into operation have a certain amount of actual

> The regulations provide that the "Commission may administer a simulated operating test to an applicant for a license to operate a reactor prior to its initial criticality if ...", among other things, the "... applicant has had extensive actual operating experience at a comparable reactor." 10 CFR 55.25(b).

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operating experience. This is especially important for the shift supervisors. Once the plant has been successfully operated, and procedures verified, the rule's experience requirement no longer applies, and additional new operators can be qualified on simulators. Had that regulation been observed, the Commission would not now be in the awkward position of having to decide on the licensing of plants -such as Diablo Canyon, Grand Gulf, and Shoreham -- none of whose operators have any actual experience operating comparable reactors at full power. I do not believe any other country with a major nuclear program would have allowed this situation to arise.

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Faced with possible delays in reactor startups if it complied with the regulation, the Commission is rationalizing its disregard for the operator experience requirement on the grounds that simulator training (as little as 80 hours) is so effective that it is no longer essential for a new crew to have actual operating experience. This is simply wrong. While they are an extremely valuable training device, simulators do not provide the equivalent of actual operating experience. And while simulators have become more sophisticated over the years, so have plants; they are now more complex and more demanding. (In the case of the above-named plants, the operators were not even trained and qualified on a simulator built to model the plant they would operate.) Moreover, reactor simulators can simulate only a fraction of the nuclear plant operations that need to be performed. Even normal startups and shutdowns can only be partially simulated. It is worth pointing out that aircraft simulators are far more faithful than reactor simulators but that many hours of actual flight time are still needed to qualify for a pilot's license. No one would dream of allowing an aircraft to take off with a new crew that had only had simulator training.

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It needs to be understood also that power plant simulators Fare designed primarily to provide training for the reactor operator whose job is to manipulate controls. The shift supervisor, by contrast, is responsible for managing the entire plant, not just the control room. Managing an entire plant's startup, operation, and shutdown cannot be learned by practicing only on a simulator. Unlike the reactor operator, the shift supervisor also has the authority to thange accident recovery procedures or to disable safety equipment if he judges this necessary. The experience meeded to make these important judgements is not developed on a simulator. Nor do simulators provide experience on performing critical safety reviews of maintenance and testing to assure that operating limits are adhered to and transients are avoided. Improper maintenance and testing are the most frequent cause of plant accidents. Thus, in waiving the experience requirement for the entire operating

crew the Commission has overlooked the special importance of experience for shift supervisors.

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Contrary to what the Commission claims, the sense of the rule has largely been complied with until the last few years -- in that, as long as a fair number of operators at a plant had actual operating experience, the purpose of the rule was satisfied. It is only recently that the Commission has allowed completely green crews to start up plaints without requiring adequate compensatory measures, in violation not only of the literal wording of the regulation but also of good safety practices.

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Instead of expunging the requirement for experience from its rules in an overeager attempt to accommodate the small number of power reactors scheduled for licensing in the near future, the Commission should have taken an approach that would have ensured that future reactors start up with an adequate number of experienced operators. For power reactors which are about to go into operation, the sensible and responsible course is not to grant a blanket exemption from the regulation's requirement for experience for the entire operating crew, but to ensure that there is at least one supervisor on each shift who has had actual operating experience. In sum, the existing rule should not be changed without ensuring that adequate provision is made for operator experience on every shift.

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