

PROPOSED RULE PR-5055
(51 FR 19561) (2)

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July 5, 1986
OFFICE OF SECRETARY
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BRANCH

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

To Whom It May Concern:

The purpose of this letter is to provide comments on the NRC proposed rule to require degrees for Senior Operators at nuclear power plants. I have been involved in nuclear power since entering nuclear power school in August of 1964. My Navy experience included three years instructor duty at a prototype and seven fleet ballistic submarine patrols. My commercial experience includes two years as Auxiliary Operator and six and one half years as a Reactor Operator at the Kewanee Nuclear Plant. Here at Callaway, I have been a Training Supervisor for a year, an Operating Supervisor for two and one half years, and an SRO licensed Shift Supervisor for two and one half years. Since September of 1980, I have been pursuing a B.S. in Physics and have about ninety credit hours toward this degree. I feel as though I have a great deal of experience in the operation of nuclear power plants.

I am opposed to a degree requirement for Senior Operators. Any degree that I might obtain would not in any way enhance my ability to operate or direct the operation of Callaway in a safer manner. It might give a perception to the ignorant that I was better qualified, but that would only be a perception and not a fact.

The following are my comments on some of the questions you have raised:

1. As I don't feel a degree is required, the January 1, 1991 deadline is not feasible.
2. The cost to the utilities is unknown but it is sure to be high. The limit to the career path of the operators, both Auxiliary Operators and Reactor Operators, will be very demoralizing. I have seen this when other than operations personnel are selected to be Control Room Supervisors. If these operators have no chance of advancement, then they will move to positions where they do have advancement, taking their experience with them. This will cause a higher turnover rate which costs the utility more while having a less experienced work force.

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add J.H. Rawson, AR 5209

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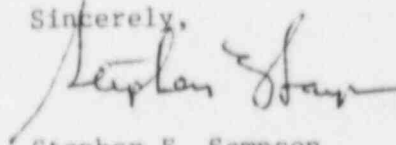
3. No; the INPO accredited Training Department here at Callaway has determined that it would take nine years for a shift worker to get a B.S. in Engineering Management. Very few people would be willing to expend the effort to get a degree on their own time.
4. No comment.
5. No comment.
6. No comment.
7. What is meant by "responsible nuclear plant experience"? Is it as a System Engineer, Equipment Operator, non-licensed Training Supervisor, or is it a person in the line of promotion to Senior Operator? Likewise, what is "hot operating requirement"? As I read this, it means that the candidate has been a licensed Reactor Operator for one year.
8. It should be replaced by intensive focused training in severe accidents. This training should be performed by a University or like institution. After having been through an INPO accredited re-licensing training program, I don't feel that either the Utilities or INPO have the necessary expertise to perform such training to the level required or evaluate its success or failure.
9. As I don't agree that there is a need for the SO position to be degreed, I feel the Utility has the right to promote who they feel is the best person regardless if he is degreed or not.
10. No comment.
11. Part I - The NRC should require specialized training in severe reactor accidents instead of requiring a degree. Again, see the response to Question 8.
Part II - No comment.
12. No comment.
13. No comment.
14. I don't foresee any good coming if this rule is adopted. The morale of the Reactor Operators and Senior Operators would plummet. As it stands now, advancement beyond Shift Supervisor is nonexistent without a degree. To take away the only avenue for advancement would do irreparable harm to the morale of the on-shift operators.
15. No comment.

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16. The change in the emergency operating procedures was needed and is very positive. I am not sure what the advantage has been to the addition of the STA other than to ease my administrative burden somewhat. Although the SPDS has been installed in our control room, very little attention, to this point, has been placed on it. Overall, these changes have been slightly effective but not as much as the originators thought.
17. In conjunction with my response to Question 14, the operators will seek other positions resulting in a high turnover. As the operators leave, the experience levels will decrease to intolerable levels such that plant safety will become a concern.
18. The second degree would do none of what this question suggests it would do. It would not enhance operator organizational status, professionalism, or esprit de corps. Operator performance would be hindered, not enhanced, for the reasons listed in previous responses.
19. At what level in the organization would these new college graduates enter? Would they bypass the normal up through the ranks starting point? If they do, where would they gain the experience that is so vital in the Shift Supervisor position? The Utilities won't want to spend the time or money to allow the operators to obtain degrees on company time.
20. The only thing that could possibly be more demoralizing than requiring a degree of all Senior Operators is to limit the number of Senior Operators to be "grandfathered".

I haven't seen any data that supports the idea that the adoption of this change to 10 CFR 50 and 55 would enhance the health and safety of the public. The safety record of commercial nuclear power plants in the United States is one of the finest in the history of the industrial era. I am concerned that the adoption of this change would mean less safety rather than more. Thank you for your time.

Sincerely,



Stephen E. Sampson
Shift Supervisor
Callaway Nuclear Plant
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Fulton, MO 65251

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SUBJ: Comments on 10 CFR 50.55

It is my feeling that a BS degree does not make an operator better equipped to handle various emergencies. Perhaps better and more detailed training requirements will weed out personnel not able to handle the rigors of the control room in an emergency. I have been in the Nuclear Industry 20 years now and 9 in the Navy. It has been my opinion and experience that a degree can never substitute for experience. I do not have a degree but am presently working toward one. However I feel and have seen many a degreed person not know what to do and have to rely on his experienced person under him to repair and mitigate damage. Also there are too many persons just holding the SRO

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Add: F.H. Rumsome, AR-5209

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20 Paperwork and not standing
enough shift work to be thoroughly
familiar with plant changes. I feel a
more stringent regular program would
weed these people out also.

If simulators were used as the
Navy uses their prototypes and
run drills and more drills the
responses become second nature but
also the understanding of why
things behave the way they do comes
in training and "experience" not a
degree. It just seems that the
answer to all the Indusidrup problems
is patch it up with a piece of paper
and not get to the root of the problem
and that is experience and training

Signed



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