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OFFICE OF THE
DOCKET CLERK

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TO NRC Commission

This letter is in response to your proposed rule change to require SRO's to have a college degree. I am not against education of any form, in fact, I am a firm believer in getting all the schooling that you possibly can. That is why I have been going to different types of schools over the years. However, I have never been able to take a full four years off to get a degree. I have had to work to feed my family. I will argue with anyone that states that they can acquire a degree while working rotating shift work, especially at a nuclear power plant. I know some have accomplished this feat, but they are the exception to the rule.

I have been in the nuclear power business since I attended Navel Nuclear Power School in 1958. Since that time I have been on the preconstruction crews for both navel and commercial reactors. I was an instructor for both enlisted and officers in the nuclear propulsion systems for the navy. I was qualified as EOOW on FBM submarines; this also happened to be my battle station. I have taken two NRC cold-license exams for commercial reactors; my license #2570-6 is still being actively used. I have heard this proposal many times; it is a little different each time to the extent of being harder to achieve.

There are only two advantages to having a degreed SRO.

1. Since degreed people wrote the ANSI standards, then it will go without saying that any job above SRO would or should require a degree. The reason they took the SRO job as a cut off is because the SRO job and below were all rotating shift jobs, and the degreed people at that time thought it was beneath them to hold these positions. Have you ever heard the saying "You think I went to four years of college to stand 6 years of rotating shift work, are you out of your ever loving mind!" The degreed person would, therefore, be able to advance above the position of SRO.
2. Because the degreed person has spent the last four years studying and taking test, then they will have less problems taking and passing an NRC exam. This in my opinion does not mean they know the content of the material tested on.

There are many disadvantages to your proposed rule change to require SRO's to have degrees. 1. By your requirement of having the (SRO) shift supervisor to have a degree then you have split the shift up and by no means is this in the best interest to the safety of the public.

2. How are we to overcome the better than thou syndrom that has a very high probability of occuring. 3. You are proposing that because the person has a degree that he (she) does not need as much board time to be qualified to go up for a SRO license; this is the most idiotic thing I have ever heard of, I could name a few hundred examples. 4. You are proposing a cut in my shift compliment, as it is now when we are running straight line I have sufficient people, but when we get into purturbations then we are streached very thin, and with the new read a script type policy that is now being imposed it is damn thin. 5. To get me off shift, the company would have to hire and train my replacement and if they started now they would not have enough time to do so. This also would about double the payroll for license operators, not to mention the cost of the school.

I would like to know why it is that the people who make the rules on how I should run our nuclear reactors do not have any hands on experience with running commercial reactors. These big babies do not run under laboratory conditions, you have to be on your toes at all times or they will try and get you. You cannot get this experience from any book.

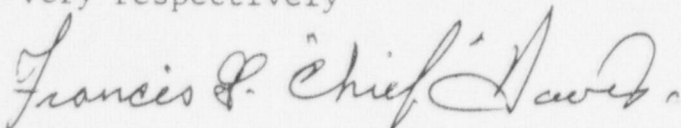
There are a few exceptions to the rule of degreed people that will stand shift work. Most of these people went to the Merchant Marine type schools which would have been a type of shift work anyway.

Now over the years the word "professionalism" keeps popping up in your proposals, so I get out Mr. Webster's book and look up the meaning each time to see if it has changed; it has't.

The next time you need a plumber make sure you ask for one with a degree so that you will be ensured of getting one with the utmost in professionalism.

In closing I must say that I cannot see any gain in regards to the health and safety of the public or increasing my image as a professional in any section of your proposed rule changes; all I can see are negative effects, I'm sorry.

Very respectfully



Francis G. (Chief) Davis

P.S.

After proof reading my comments above I saw where I had failed to mention one very negative aspect and that is that the turn-over rate would increase. This would loose a very large amount of experienced people.