

TICKET NUMBER: PR 50,55
PROPOSED RULE

(43)

(53 FR 52116)

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20 Sidney Lane
Wappingers Falls, NY 12590
Feb. 14, 1989

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

Dear Commissioners,

This letter is a comment to the proposed rule to amend regulations regarding educational requirements for operating personnel at nuclear power plants as published in the Federal Register Volume 53, Number 250 Thursday, December 29, 1988,

I strongly oppose any requirement to require a degree for any operator, reactor operator, senior reactor operator, shift supervisor or shift manager. The most important reason is the safety of the public. Pursuing a degree by any operator detracts from the time he or she spends familiarizing themselves with the facility equipment, procedures, rules and regulations, personnel (and their family).

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as clearly demonstrated this rule has taken attention away from the facility and focused it upon academic subjects that are little related to plant operations, and the pursuing a quest for detailed knowledge of plant and procedures. The one thing that can really mitigate core damage. The operator will not be required to re-engineer any component "design" during an ~~emergency~~ emergency, but rather utilize what is available to ~~the~~ mitigate the accident upon relying on plant knowledge, especially the knowledge to detail idiosyncrasies of the facility.

By detracting from direct involvement in the facility operation (except for training, ~~plant~~ specific) the stress factor during an accident increases, the error rate approaches.

one (1) during a longer period of time following confrontation of a core melt (life threatening situation).

The proposed rules supplementary information contained many erroneous assumptions, statements and conclusions. Item "should not cause hardship for those in training", this is the most preposterous statement, for any person engaged in license training (1-2 year program) to also pursue a degree is impossible. On this basis alone drug testing for the Commission should be initiated immediately, because there is no touch with reality. What I want to propose that all the Commission who is for this degree on shift first spend 12 weeks on shift in a commercial nuclear facility.

The Commission, by its pursuit of this requirement, has brought about some of the most disastrous programs yet. The Shift Technical Advisor (STA) program disgraced, dehumanized the industry

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personnel by displacing intelligence onto shift were they could totally experience the concept of "fish out of the water." Operators from around the country only laughed at the idea of a non-experienced "observer" on shift proposing any type of sound advice during an accident. The last thing that needs to be done is to re-engineer during the accident.

Spend the time and money in upgraded training for operators. The INPO "accreditation" does not comply with the true definition of the "NRC definition." An accredited defined as an educational institution in the United States which has been approved by a regional accrediting body. Training has improved only slightly since TMI. The same Pressurizer Relief Valves are still "isolated" at facilities as the one that caused problems at TMI.

Nu Reg 0700, Control Room Design and Review was not completed by qualified individuals. Large error rates due to simple "Human Factors" prevail and are sometimes these errors show up as ~~Human~~ "Human Error". Status Lights for Safeguard Equipment cannot be tested due to ~~or~~ the lack of a "Test Push Button". Qualified Human Factors Specialist would shriek ~~in terror~~ if they were to see many of the control rooms.

The NRC does face a dilemma of dealing with INPO, NUMARC and Utility Vice Presidents, who never operated a nuclear facility. To try to get someone to allocate resources for training, upgrades and equipment, that does not really understand the proper priorities is frustrating.

Instead of trying to infuse
degreed operators into management,
try to infuse management into
sound operating principles.
Fines, shutdowns and public
embarrassment has not worked
trying to get the bad performers (facilities)
in line. I suggest a direct
input into the utility bond
ratings. Not trying to get
operators degreed.

Sincerely Yours,

Robert N. Meyer

Robert N. Meyer

Previously Licensed Reactor Operator
Certified SRO Training Instructor
Founder of The Professional
Reactor Operator Society

P.S. \$100 Billion spent for TMI
upgrades and the operators have
not seen any improvements.