

System Council U-2.

DOCKET NUMBER
PROPOSED RULE

PR 50,55

(53 FR 52716)

61

International Brotherhood Electrical Workers

'89 FEB 21 P6:34

Jurisdiction

PUBLIC SERVICE ELECTRIC
AND GAS COMPANY, N. J.

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February 14, 1989

Secretary
U.S. Nuclear Regulatory Commission
Docketing and Service Branch
Washington, D.C. 20555

Gentlemen:

We the licensed operators of I.B.E.W. Local #1576 of Salem and Hope Creek Generating Stations are opposed to both alternative 1 or 2 concerning degree requirements for operators regarding 10 CFR parts 50 and 55.

This requirement would severely limit the advancement opportunities of Union licensed Control Operators due to the added hardship of obtaining a degree and working shift work. Alternative 1 would in effect rule out the possibility of an N.C.O. moving into the S.O. position, which is presently in our Agreement. Aside from family hardships, time would have to be dedicated from the companies to allow following a college course schedule. Since both Salem and Hope Creek started operation, there has always been a need for more licensed personnel. Constant turnover to management, the length of class to obtain a license and people moving to other parts of the country have never afforded N.C.O.'s specific free time.

We feel the Health and Safety of the general public will not be enhanced nor will on shift operations because of his turnover rate and the limited practical knowledge of these individuals. Utilities will have trouble meeting the degree requirement without hiring directly off the street. The individuals that are direct hires will use shift work and the S.R.O. License as a career stepping-stone not as a lifetime commitment. This will deplete the operating knowledge level gained by experience.

Alternative 2 although shifting the concern to management positions doesn't change the problems of allotting time to go to school to get a degree and provide greater potential.

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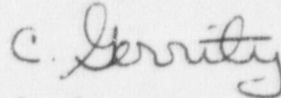
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Although we can understand the idea behind these proposed rules, we feel either rule closes the door to any continued career path. Employees whether in the bargaining unit or management who have or do hold a license offer so much technical knowledge they are a benefit in any department.

We of I.B.E.W. Local #1576 feel the main objective of the S.R.O. during all phases of plant operations, normal, abnormal and accident is to maintain a clear overall understanding of conditions present in the plant. This understanding is gained by years of experience with integrated plant operation, not with an engineering license or degree requirement.

Local #1576 IBEW is comprised of some 40 BWR and PWR Control Operator licenses and various non-licensed individuals.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "C. Gerity".

C. Gerity
President L.U. #1576 IBEW
The Licensed Operators of
IBEW L.U. #1576