



Portland General Electric Company

DOCKET NUMBER  
PROPOSED RULE

PR 50,55  
(53 FR 52716)

127

DOCKETED

David W. Cockfield Vice President, Nuclear

'89 FEB 27 P2:49

February 24, 1989

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

Secretary of the Commission  
Attn: Docketing and Service Branch  
U.S. Nuclear Regulatory Commission  
Washington DC 20555

Dear Sir:

Comments on Proposed Educational and  
Experience Requirements Rule (53 FR 52716)

On December 29, 1988, the Commission published for comment (53 FR 52716) its proposed rule [Title 10, Code of Federal Regulations, Parts 50 and 55 (10 CFR 50 and 55)] to require additional education and experience requirements for senior operators and supervisors. Portland General Electric (PGE) is pleased to provide the following comments on the proposed rulemaking.

While we endorse the stated motivation behind the proposed rulemaking of protecting public health and safety by enhancing the capability of the operating staff to respond to accidents, we question the ability of the proposed rule to achieve that objective. In fact, we believe the proposed rule would do just the opposite. The following forms the basis for that conclusion:

- Shift experience levels lowered due to probable higher turnover rates of degreed operators (Reference 1).
- Morale lowered because the career growth of a non-degreed operator is limited (Reference 1).
- A focused training program is more effective than a college degree for enhancing accident response (Reference 2).
- Operator performance will suffer with imposition of a formal degree requirement without evidence that the degree is necessary to do the job (Reference 3).

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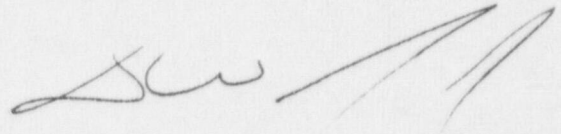
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Imposition of the proposed rule which has received such overwhelmingly negative comments from the industry in the past will, in our opinion, detract from our ability to maintain an experienced and motivated staff. Such a staff is essential for safe and reliable operation.

In addition, we endorse Nuclear Management and Resource Council's (NUMARCs) letter of January 27, 1989 requesting that the comment period be extended for an additional 30 days. The reason for our endorsement is that we do not have sufficient information to argue the pros and cons of Alternative 2 of the proposed rule. Our preliminary views are that the number of programs accredited by the Accreditation Board for Engineering and Technology (ABET) in our location may be quite limited. Also, Alternative 2 may create much of the same objectives we have expressed above for Alternative 1. We need further time to adequately substantiate our suspicions.

Sincerely,

A handwritten signature in dark ink, appearing to be 'D. W. Dixon', written in a cursive style.

c: Mr. John B. Martin  
Regional Administrator, Region V  
U.S. Nuclear Regulatory Commission

Mr. William T. Dixon  
State of Oregon  
Department of Energy

Mr. R. C. Barr  
NRC Resident Inspector  
Trojan Nuclear Plant

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February 24, 1989  
Attachment

REFERENCES

1. "An Attitude Survey of Nuclear Power Operations Personnel on the Degree Requirement for Senior Reactor Operators", contained in letter from KMC, Incorporated to the NRC, dated August 10, 1988.
2. "Operator Response to Incidents, A Prohibitive Risk Perspective", contained in letter from KMC, Incorporated to the NRC, dated September 29, 1986.
3. "Report of the PEER Advisory Panel and the Nuclear Regulatory Commission on Operator Qualifications" (SECY 82-162).