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Thomas Mohr
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Downers Grove, IL
60516

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

Dear Sirs:

I am writing to comment on proposed rule changes to 10CFR Parts 50 and 55; Education and Experience Requirements for Senior Reactor Operators and Supervisors at Nuclear Power Plants.

I have been a Senior Reactor Operator and Shift Supervisor for 8 years. I hold a Bachelors Degree in Applied Physics. I am a Registered Professional Engineer in Illinois. Currently I am responsible for maintenance of emergency operating procedures at Dresden Station. It is my opinion that the alternatives proposed will not further ensure the protection of the public nor will it enhance the capability of the operating staff to respond to accidents or restore the reactor to a safe and stable condition. Neither alternative should be enacted as rule.

My greatest objection to both alternatives is that they would eventually reduce to nothing the number of Reactor Operators (ROs) advancing to Senior Operator (SOs). Contrary to the times stated in the notice, it typically would take an RO 7 to 8 years to obtain a BS degree while continuing to work on a rotating shift as an RO. Few people find themselves in a position to make this type of commitment for that amount of time. The net result would be SOs obtained by hiring and training degreed individuals with little operating experience, reducing the operating experience level of SOs. This will block career advancement at the RO level. This career stagnation at the RO level will make it more difficult to find motivated people to fill both Auxiliary Operator (AO) and RO positions.

To ensure the health and safety of the public and to enhance the capability of the operating staff to respond to accidents, nothing can take the place of advanced preparation. Recent upgrades in emergency operating procedures have resulted in better transient response capabilities. Changes in operator requalification now emphasize adherence to these procedures providing proficiency through practice. Emergency response is best implemented by the availability, to the operating staff, of a well trained multi-disciplinary team familiar with all aspects of

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nuclear technology supporting the the staff in all ares of operation.

Both alternatives to the proposed rule change provide no enhancement of reactor safety. Both alternatives will reduce the experience level of SOs. Both alternatives will cause career stagnation and animosity among ROs and AOs. For these reasons neither alternative should be enacted as rule.

Thomas Mohr
SRO, BS, PE