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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.

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.

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.

Daniel Carlson

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