

DOCKET NUMBER  
PROPOSED RULE

PR 50,55

195

(53 FR 52716)

March 21, 1989

'89 MAR 24 P3:51

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

OFFICE OF THE SECRETARY  
DOCKETING AND SERVICE BRANCH

Dear Sirs:

I would like to comment on the Proposed Rule regarding the "Education and Experience Requirements for Senior Reactor Operators and Supervisors at Nuclear Power Plants."

As a US Naval Academy graduate and having served six years as an officer in the Navy's nuclear program, I feel that the proposed rule is fully justified. I feel that the technical college degree does make a difference in the probability that an individual will have the characteristics desired of a nuclear plant supervisor. While it is clear to me that there are many persons without college degrees who do function as excellent supervisors, it is more important that exceptions not be allowed to "make the rule." The requirement for a college degree will better assure that the overall level of expertise in supervising nuclear operations will be higher than without the degree requirement.

I would like to make one comment regarding the specifics of the proposed rule. I would like to see certain qualifications in the Navy's program be considered as evidence of qualification for civilian nuclear operations. Specifically, I would recommend that qualification as Engineer Officer of a Navy Nuclear Propulsion Unit be

8903290435 890321  
PDR PR  
50 53FR52716 PDR

DS 10

accepted as meeting any education and experience requirements. I make this recommendation for the following reasons:

- This qualification carries with it an appropriate college degree requirement.
- This qualification has a minimum experience requirement in a supervisory capacity.
- This qualification shows that a special trust has been placed in the individual by the Director of the Navy Nuclear Propulsion Program.

Thank you for considering my comments.

Sincerely,



Robert J. Ginsberg

Docket # 55 - 21178

License # SOP - 20721

Ginsberg  
1 Paddock Lane  
Hampton, VA 23669