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(53 FR 52716)

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

March 21, 1989  
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Brian Young  
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Commissioners,

In regard to the proposed rules for 10CFR 50 and 55 "Education and Experience Requirements for Senior Reactor Operators and Supervisors at Nuclear Power Plants," the proposal of requiring SRC's to have degrees has been brought up in the past and has been soundly rejected everytime. Although the proposal does have some good points, the degree requirement for SRC's has in the past and will continue to carry negative connotations. One of the most negative aspects of the proposal is the publics' perception of such a proposal being made by the commission. The proposed rule is implying that the SRC's presently licensed by the NRC are not qualified to operate the nation's nuclear power plants. While also inferring existing SRC training programs are inferior and are so inadequate that they cannot be improved to meet the proposed educational requirements. If the commission wants to increase the SRC's "Engineering and Accident Assessment expertise" on shift, proposal should be made to improve the existing training programs to insure the SRC's receive the specialized training to meet the commission's standards.

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The type of degree required in the proposed rule is too broad to meet the goals within it. A Electrical Engineer or Civil Engineer just does not have the educational background to provide "Engineering and Accident Assessment expertise" on a Mechanically oriented design. Their educational background would be more of a hindrance to their expertise and may decrease the operating crews' ability to mitigate the consequences of an accident.

I am presently enrolled in college and am working toward a Mechanical Engineering degree. Of the classes that I have taken and will take in the future, only about 5% of them have relevance to the knowledge needed to provide the "Engineering and Accident Assessment expertise". The training necessary to give the SRO's the level of knowledge to provide the expertise desired could be provided over the next couple of years. This would provide a faster resolution to the present situation, while also assuring a more effective means by providing the SRO's with the specialized training in the field of "Engineering and Accident Assessment expertise".

Over the recent years, retired Naval personnel have entered the ranks of the upper management at several commercial Nuclear Power Plants. At several of these facilities, their military oriented methods of management have been ineffective and have caused operators' moral to decrease. Instituting the Proposed Rule will further degrade the operators' moral since this will restrict their advancement severely. This will result in the better and more qualified operators leaving plant operations to pursue better opportunities elsewhere.

The degree requirement will place a hardship on the Utilities to meet the necessary requirements. There are very few people in this industry that have a degree and would be willing to work rotating shift work for 10-15 years. The Utilities will find it very difficult to fill these positions and the type of people these positions would attract will be of low quality, due to the fact that these people cannot find other jobs.

The people that are presently operators, have always wanted to be in the profession that they are in and want to be the best at it. Thus, the present personnel can be trained more effectively and efficiently to provide the expertise desired on a operating crew.

The items in the Proposed Rule that should be established, are the requirements to have three years operating experience and one year with an RO license at greater than 20%. Also, the elimination of the instant SRO program. This would greatly increase the operating crews' ability to handle plant transients, due to the increased experience of the operators. Every plant is too unique not to have this type of experience on an operating crew.

The Proposed Rule of 10CFR 50 and 55 consists of two alternatives and both requires a degree for either all SRO's or the Shift Supervisor. Either alternative will have a severe negative effect on this industry and could very well lead to a decrease of the General Publics' safety at a large number of the nations' Nuclear Power Plants.

Thank you for your concern in this matter.

Sincerely,



Brian D. Young