

PUBLIC SUBMISSION

As of: 8/23/22, 9:59 AM
Received: August 23, 2022
Status: Pending Post
Tracking No. 176-7jbd-fhqf
Comments Due: August 31, 2022
Submission Type: Web

Docket: NRC-2019-0062

10 CFR Part 53: Risk-Informed, Technology-Inclusive Regulatory Framework for Advanced Reactors

Comment On: NRC-2019-0062-0176

Risk-Informed, Technology-Inclusive Regulatory Framework for Advanced Reactors

Document: NRC-2019-0062-DRAFT-0268

Comment on FR Doc # 2021-26877

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General Comment

I am writing to comment about the proposed changes to require an undergraduate college degree to become a certified reactor operator. It is my professional opinion that this is not a relevant requirement for safe reactor operation and will in fact be an unjust requirement. Many current reactor operators have no such degree since the required training regime more than covers all relevant knowledge. There are operators with no degree currently operating HEU reactors many meters underwater and research reactors with far more complex operating parameters than any conceivable power reactor. I see no reason why this precedent could not continue forward. Nuclear reactors operators make great wages without college degrees, which is a huge advantage in many communities. It will continue to be so as our society transitions from fossil fuels to clean power, with many plans for reactors at previous coal facilities. This rule change could make the clean transition a less just one, which will especially hurt poor and minority communities. In addition, an engineering degree (even a nuclear engineering degree) does not provide some special knowledge of reactor operations and often provides no practical knowledge at all! I personally gained practical nuclear reactor experience by becoming a reactor operator on a research reactor before finishing my nuclear engineering degree. With this proposed rule change certain universities may no longer be able to offer that as an option for students, which would be a major loss. I urge you to continue with the current reactor operator requirements instead of tightening the ratchet and excluding yet more people from good opportunities.