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General Comment

As a former licensed SRO and long time SRO instructor, I find the requirement to have an engineering degree to be a licensed operator very shortsighted. I've taught several license classes as well as licensed operator requalification and a degree has little to nothing to do with an SRO or RO's ability to perform the job well. Given the increased simplicity of the new designs and the ease with which they can be shutdown I don't see how that will change in the future.

The role of an STA as practiced in commercial nuclear power has nothing to do with their engineering degree. The engineering function is supported by an entire department. Their post accident function can easily be served by any licensed SRO given the better training they are given and the vastly improved procedures in use.

Limiting the ranks of licensed operators to degreed personnel will put a further barrier in place to properly staffing these units. The industry is already experiencing a staffing problem and this would severely limit the population able to fill the roles. It would also largely prevent enlisted Navy personnel from using their Navy nuclear experience in the civilian world. This population has long been the backbone of the civilian nuclear fleet and should not be discarded so lightly.

As the Commission itself said, the STA role was meant to be temporary. Substituting a new requirement to make all licensed operators be engineers is ignoring the commissions own acknowledgment that the industry has reach a point where that function is no longer needed.