



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, D. C. 20555

December 14, 1982

The Honorable Nunzio J. Palladino  
Chairman  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Dr. Palladino:

SUBJECT: ACRS COMMENTS ON RULEMAKING CONCERNING STAFFING AT NUCLEAR POWER PLANTS AND DRAFT POLICY STATEMENT ON SHIFT CREW QUALIFICATIONS

During its 271st meeting, November 4-5, 1982, and its 272nd meeting, December 8-10, 1982, the ACRS considered the proposed final rule entitled "Licensed Operator Staffing at Nuclear Power Units" and a proposed draft policy statement on "Shift Crew Qualifications." These matters had been previously discussed with representatives of the NRC Staff and industry at a Subcommittee meeting in Washington, D.C. on October 28, 1982. The proposed rule was not reviewed by the ACRS before it was issued for public comment.

We agree with the proposal to amend 10 CFR Part 50.54(m) to require a sufficient number of licensed Senior Reactor Operators on each shift to assure adequate supervisory coverage in the control room while permitting the Shift Supervisor, who is also an SRO, flexibility to move about the facility. We believe it is highly desirable that an individual with the training and experience required of an SRO be present in the reactor control room a very large fraction of the time. However, the requirement for 100 percent coverage is too restrictive. We urge that the NRC Staff consider some flexibility concerning how near an SRO must be to the control room or what small fraction of the time he or she might be absent.

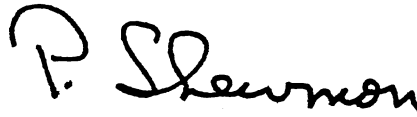
We endorse postponement to January 1, 1984 of the originally proposed implementation date for the rule. Selecting, training, and licensing the highly qualified individuals required to operate nuclear power reactors is a complex process. While most licensees already meet the intent of the proposed rule, or are scheduled to meet it well in advance of the proposed date, we believe a reasonable time should be permitted to allow the remaining licensees to comply.

The proposed policy statement on "Shift Crew Qualifications" would permit licensees to combine the functions of the SRO and the Shift Technical Advisor in one individual, provided that person meets all the requirements of both positions. We strongly endorse this proposal and believe it is preferable to the separate Shift Technical Advisor position now required. Combination of supervisory authority and perspective with engineering and analytical

capability will provide an effective shift organization for dealing with both normal and emergency situations.

Additional comments by ACRS Member Dr. H. W. Lewis are presented below.

Sincerely,



P. Shewmon  
Chairman

Additional Comments by ACRS Member Dr. H. W. Lewis

While I agree with the sense of the Committee letter, there remain a couple of points that concern me.

First, in view of the somewhat more relaxed schedule for the implementation proposed in the current version of the rule, I cannot see why it should not go through the Committee to Review Generic Requirements. I had thought that the function of that Committee was to assure high quality for proposals such as this.

Second, I would greatly strengthen the ACRS recommendation that the NRC Staff consider some relaxation of the admittedly arbitrary 100 percent attendance feature of the proposed rule. Any understanding of accident probabilities leads to the conclusion that small absences (in space or time) make correspondingly small contributions to the risk.

Third, I am troubled by the underlying philosophy, which suggests that numbers in the control room are the important issue. While there surely exist accident sequences which require several people for their management, it is equally true that Three Mile Island revealed more deficiencies in quality than quantity. There is little evidence that the Staff has tried to trade off these values. Of course, the upgrading from RO to SRO implies a higher level of training, but the proposed rule deals with more SROs, not better SROs. However, if the fusing of the roles of SRO and Shift Technical Advisor is really implemented, that will be a move in the right direction.

This rule, as finally promulgated, will have a long life -- there is every reason to be a little more certain that it has the right form.

Reference:

1. Draft memo to Commissioners from William J. Dircks, Executive Director for Operations, Subject: Final Rulemaking Concerning Staffing at Nuclear Power Plants and Draft Policy Statement on Shift Crew Qualifications, transmitted by memo from K. Goller dated December 3, 1982