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 RECIP. NAME RECIPIENT AFFILIATION  
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director  
 STOLZ, J.F. Operating Reactors Branch 4

SUBJECT: Responds to NRC 820709 ltr reviewing shift technical  
 advisor training programs required by Item I.A.1.1 of  
 NUREG-0660 & NUREG-0737. Disagrees w/NRC expectation that  
 all new hires have bachelors degree or equivalent.

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 TITLE: Response to NUREG -0737/NUREG-0660 TMI Action Plan Rgmts (OL's)

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# DUKE POWER COMPANY

## GENERAL OFFICES

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August 12, 1982

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Mr. J. F. Stolz, Chief  
Operating Reactors Branch No. 4

Subject: Oconee Nuclear Station  
Docket Nos. 50-269, -270, -287

Dear Sir:

In your July 9, 1982 letter regarding the Staff review of our Shift Technical Advisor (STA) training programs as required by Item I.A.1.1 of NUREG-0660 and NUREG-0737, the Staff determined that our STA training program is acceptable in meeting the intent of the guidelines set forth on this subject. The Staff also determined that our current STA selections are acceptable and meet the intent of the requirements specified in the September 13, 1979 and October 30, 1979 Staff letters, noting that our STA program includes non-degreed candidates. Duke Power Company agrees with those determinations.

We disagree, however, with the Staff's expectations that all new hires have a bachelor's degree or equivalent, pending new guidance from the Commission. First, Duke Power does not intend to lower our standards concerning education requirements, experience and training for STAs. Our STAs currently are acceptable and any future STAs will be at least as well qualified and trained. Thus, if our program is good now, it should remain so pending new guidance or standards.

The specific need for a degreed individual on-shift has not yet been demonstrated by the Staff and to expect additional interim restrictions on an acceptable program without an identifiable gain in safety seems inappropriate. An in-depth analysis of the STA function in particular and shift staffing in general needs to be made prior to imposing restrictions. To this end Duke Power Company is committed to the Institute for Nuclear Power Operations (INPO) Job Task Analysis Study and plans to abide by the results of its findings. Also, new guidance from the Commission on shift staff qualifications, as your letter indicated, may be forthcoming. Thus, changes without demonstrated need at this time would be premature.

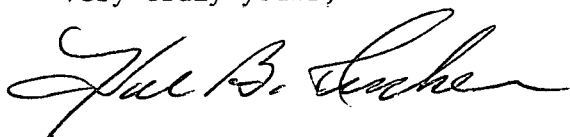
Duke Power Company remains committed to the safe, efficient operation of our power stations, and any changes which will result in safer and more efficient operations will be gladly implemented. Duke will continue to work closely with the Staff in any way possible to achieve these goals.

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Mr. Harold R. Denton, Director  
August 12, 1982  
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Very truly yours,

A handwritten signature in cursive script, appearing to read "H. B. Tucker". The signature is fluid and extends across the width of the typed name below it.

H. B. Tucker, Vice President  
Nuclear Production Department

JFN/php