

CATEGORY 2

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9705090033 DOC. DATE: 97/04/23 NOTARIZED: NO DOCKET #

FACIL: STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528

STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529

STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530

AUTH. NAME AUTHOR AFFILIATION

LEVINE, J. Arizona Public Service Co. (formerly Arizona Nuclear Power

RECIP. NAME RECIPIENT AFFILIATION

Division of Freedom of Information & Publications Services

SUBJECT: Comment supporting draft RG DG-1068 (proposed Rev 3 to RG 1.134, "Medical Evaluation of Licensing Personnel at NPPs").

DISTRIBUTION CODE: DS09D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5

TITLE: SECY/DSB Dist: Public Comment on Proposed Rule (PR)-Misc Notice; Reg G T

NOTES: STANDARDIZED PLANT 05000528 E

Standardized plant. 05000529

Standardized plant. 05000530 G

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	
INTERNAL:	FILE CENTER 01	1 1	NMSS/IMOB T8F5	1 1	Y
	OGG/DR-15-B-18	1 1	RES DIR	1 1	
	RES/DRA/DEPY	1 1	RES/DST	1 1	2
EXTERNAL:	NRC PDR	1 1			

C
A
T
E
G
O
R
Y

D
O
C
U
M
E
N
T

NOTE TO ALL "RIDS" RECIPIENTS:
PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTTR 7 ENCL 7

may



DS09
D. McCain

62FR 284
Feb. 20, 1997

(5)

Palo Verde Nuclear
Generating Station

James M. Levine
Senior Vice President
Nuclear

TEL (602)393-5300
FAX (602)393-6077

Mail Station 7602
P.O. Box 52034
Phoenix, AZ 85072-2034

102-03915-JML/AKK/KR
April 23, 1997

Rules, Review and Directives Branch
Division of Freedom of Information and Publication Services
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Comments on Draft Regulatory Guide DG-1068**

RECEIVED
1997 MAY -7 AM 9:52
RULES REVIEW & DIR. BR.
USHRC

Arizona Public Service Company (APS) hereby provides as an enclosure to this letter comments to the Draft Regulatory Guide DG-1068 (proposed Revision 3 to Regulatory Guide 1.134, "Medical Evaluation of Licensing Personnel at Nuclear Power Plants"). We appreciate the opportunity to comment on the NRC's revised draft.

If you have any questions, please contact Daniel G. Marks, Section Leader, Nuclear Regulatory Affairs, at (602) 393-6492.

Sincerely,

Gregg H. Overhiser for JML

1/1

JML/AKK/KR/kr

Enclosure

I+P-11
Guides
+
manuals

9705090033 970423
PDR REGGD
01.134 C PDR



NRC Rules, Review and Directives Branch
Page 2

Comments on DG-1068

bcc: M. F. Maddix 6106
J. C. Velotta 6156
R. C. Fullmer 7992
N. E. Meador 7636
RCTS 042361



ENCLOSURE

COMMENTS FOR DG-1068



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

COMMENTS FOR DRAFT REGULATORY GUIDE DG-1068

The comments are restricted to Section C. REGULATORY POSITION specific to the endorsement of ANSI/ANS 3.4-1996, "Medical Certification and Monitoring of Personnel Requiring Operator Licenses for Nuclear Power Plants." The requirements contained in ANSI/ANS 3.4-1996 provide methods acceptable to the NRC staff for determining the medical qualifications of applicants for initial or renewal operator (RO) or senior operator (SRO) licenses.

APS requests that the endorsement of ANSI/ANS 3.4-1996 be subject to the following:

1. **Section 3.2 Facility Licensee's Report (FLR)** states that the facility licensee shall forward to the physician a report on each licensed S/RO ... prior to the examination. This report shall address areas such as work performance, attendance, and behavioral changes noted since the previous review. Incidents of ineptness, poor judgment, and lack of physical or emotional stamina should be noted. Unusual cases of absence or lateness, and accident experience, should be recorded. Potential medical or psychological problems that could impair an individual's judgment or ability to perform assignments are more likely to be identified by the physician when this information is provided.

APS believes that the requirements of 10CFR26, Fitness for Duty Programs, are better suited as a real-time solution to assessing an S/RO's medical or psychological problems. Per 10CFR26.22(a), managers and supervisors must be provided appropriate training to ensure they understand techniques for recognizing drugs and indications of the use, sale, or possession of drugs, as well as behavioral observation techniques for detecting degradation in performance, impairment, or changes in employee behavior and procedures for initiating appropriate corrective actions. APS believes that waiting until a physician assesses this behavioral information prior to examination is not only untimely, but transfers the burden of responsibility of assessing these problems on to a physician that is not as familiar with each individual's "normal" behaviors.

APS requests that the endorsement of ANSI/ANS 3.4-1996 exclude Section 3.2, removing the additional burden of reporting to a physician behavior problems that are not clinical and already should have been addressed.

2. **Section 5.3.2 Ears** changes the audiometric average threshold loss from ≤ 30 Db in ANSI/ANS 3.4-1983 to ≤ 25 Db in ANSI/ANS 3.4-1996. Since 25 Db is considered "normal" hearing, the ANSI requirements are unnecessarily restrictive and provide for additional, as well as expensive, testing (i.e., audiologic evaluation, including a standard speech discrimination test) with a passing score of 80 percent. It is possible that a passing score of 80 percent would still allow an S/RO to perform control room duties with hearing loss > 30 Db.

APS requests that the endorsement of ANSI/ANS 3.4-1996 Section 5.3.2 be subject to the original requirements of ANSI/ANS 3.4-1983, in that, if audiometric scores are unacceptable, qualification may be based upon onsite demonstration to the satisfaction of the licensee of the S/RO's ability to safely detect, interpret, and respond to speech and other auditory signals.

3. **Section 5.3.5 Cardiovascular** provides for an additional stamina evaluation through use of a treadmill, bicycle ergometer, or other valid and reliable testing method for measuring aerobic capacity. Requiring a mandatory stamina evaluation for every S/RO without some other diagnosed indication of cardiovascular problems imposes an unnecessary financial burden on the licensees. In addition, APS believes that "or other valid and reliable testing method for measuring aerobic capacity" is subject to a physician's interpretation and the chosen testing method may be criticized by the NRC as not satisfying the "intent" of ANSI/ANS 3.4-1996.

APS requests that the endorsement of ANSI/ANS 3.4-1996 Section 5.3.5 be subject to some indication that the stamina evaluation is necessary prior to performance, such as an individual's age, history of cardiovascular problems, or general physical health degradation.

