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U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555
OFFICE OF PUBLIC AFFAIRS

March 9, 1992
NRC-92-0035

Secretary, U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
Attn: Docketing and Service Branch

References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

2) Federal Register, Vol. 57, No. 4, Page 537
RIN 3150-AD80, dated January 7, 1992

Subject: Comments on Proposed Rule on Training and Qualification
of Nuclear Power Plant Personnel (57 FR 537)

The purpose of this letter is to provide Detroit Edison's comments on the subject proposed rule described in Reference 2. Detroit Edison appreciates the opportunity to participate in such an important rulemaking. We also recognize and appreciate the NRC's effort to write a rule that is much less prescriptive than the earlier drafts.

Detroit Edison believes that the industry has established highly successful performance-based training programs that have contributed to safe and efficient operation of our nation's nuclear power plants and that stand as the model for other nations with nuclear power facilities. Therefore, it is unfortunate that a rule is being required by the courts considering the acknowledged effectiveness of current training programs and the fact that neither public health and safety nor the public interest require the adoption of such a rule. It has been repeatedly concluded that the industry's training and accreditation programs are effective for ensuring that personnel have qualifications commensurate with the performance requirements of their jobs.

Therefore, Detroit Edison's position is that a training rule is not needed although it is realized that court decisions mandate that the NRC develop such a rule. The highly successful training and accreditation programs presently in place and the continuing emphasis on training through the National Academy for Nuclear Training are evidence of the commitment the industry has made to improve training and overall plant performance.

Secretary

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If there is going to be a training rule, it should be ensured that the rule and its future interpretations does not conflict with the existing industry programs or impose any additional burdens on the industry since no additional actions are needed beyond current industry programs proven to be effective to protect the health and safety of the public. Therefore, the statement of consideration issued with the final rule should state the requirement "maintaining an INPO accredited training program .

Additionally, Detroit Edison has reviewed and strongly supports the NUMARC comments on the proposed training rule.

If you have any questions, please contact Mr. Girija S. Shukla at (313) 586-4270.

Sincerely,



cc: T. G. Colburn
A. B. Davis
R. W. DeFayette
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