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M. W. Hodges

61 FR 52977  
Oct. 9, 1996

**Arizona Public Service Company**

PALO VERDE NUCLEAR GENERATING STATION  
P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

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RULES REVIEW & LIAISON  
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November 14, 1996

Rules Review and Directives Branch, DFIPS  
Office of Administration  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Reference: Draft Regulatory Guide DG-1012, September 1996

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. STN 50-528/529/530  
Comments to Draft Regulatory Guide DG-1012**

Arizona Public Service Company (APS) on behalf of PVNGS Units 1, 2, and 3 submits the enclosed comments to the draft Regulatory Guide DG-1012 (proposed Revision 3 to Regulatory Guide 1.8, "Qualification and Training of Personnel For Nuclear Power Plants"). We appreciate the opportunity to comment on the proposed revision to Regulatory Guide 1.8 and the Staff's consideration of our comments.

If you require additional information or wish to discuss the comments, please contact John C. Velotta, Director, Nuclear Training Department at (602) 393-1785.

Sincerely,

*Angela K. Krainik*

Angela K. Krainik, Department Leader  
Nuclear Regulatory Affairs

AKK/KR/kr

Enclosure

cc: L. J. Callan

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PDR REGGD  
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IEP-11 Guidelines Manual  
X IDIR-5 Facility License

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(61 FR 52977)

**ENCLOSURE**

**COMMENTS ON DRAFT REGULATORY GUIDE DG-1012  
QUALIFICATION AND TRAINING OF PERSONNEL  
FOR NUCLEAR POWER PLANTS**

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QUALIFICATION AND TRAINING OF PERSONNEL  
FOR NUCLEAR POWER PLANTS**

The following comments correspond to the numbered sections and titles used in Section C. REGULATORY POSITION of DG-1012.

2.2 Section 4.1.4, Training.

Section 6.2.2 of ANSI/ANS-3.1-1993 is intended to be the recommended process for specific positions not identified in section 4.1.4. The suggested replacement to section 6.2.2 for independent review personnel refers to using a task list as the foundation for comparing an individual's experience and knowledge in order to provide specialized training. However, this suggested replacement is describing the systematic approach to training (SAT), the process in section 6.2.1 for which section 6.2.2 is designed to be an alternative. An alternate process needs to be developed.

2.3 Managers' Training.

This section should remain consistent with section 4.3.1 Training. Managers of training programs do not need to have the same knowledge in the technical area(s) that their training programs address. For example, maintenance training programs for instrumentation and control technicians, electrical maintenance personnel, and mechanical maintenance personnel can be managed effectively by a person who does not demonstrate the knowledge in each of these three maintenance areas. Another example would be a single manager for the combination of chemistry and radiation technician training programs. To require the manager to demonstrate knowledge in the technical area(s) could subordinate the more important qualifying characteristics of effective leadership skills and a high level of knowledge of training technology to the lesser need. It may be overly restrictive, inhibiting innovation. Maintaining a training staff with knowledge in the technical area is sufficient.

2.4 Section 4.2.2, Operations Manager.

The specified special requirements should be only applicable to the first management level above the Operations Shift Supervisors.

2.5 Section 4.3, Middle Manager Level.

To require that the middle manager meet the qualification requirements described for their position could in some cases subordinate the more important qualifying characteristics such as effective leadership skills, a high level of

knowledge of training technology, etc. to lesser characteristics. It may be overly restrictive, inhibiting innovation. Maintaining a staff with knowledge in the technical area may be sufficient in selected cases.

2.7 Section 4.3.3, Radiation Protection Manager (Middle Manager Level).

It is recommended that the term "professional-level experience" be defined.

2.8 Section 4.4.6, Radiation Protection (First Line Supervisor Level).

Section 4.4.6 should remain as is. Each supervisory candidate should be evaluated on an individual basis. Otherwise, characteristics such as effective leadership skills could be relegated to lesser significance in favor of experience.

2.9 Section 4.5.1, Reactor Operator.

This additional qualification to the 0.5 year on-site experience should not be incorporated. Other experience alternatives could be applicable. The training program which is based on SAT as described in section 6.2.1 provides the knowledge, skills, and abilities to perform effectively as a reactor operator.

2.10 Section 4.5.5, Quality Control, and Section 4.5.6, Quality Assurance.

The reference should not be replaced by NQA-1-1983, as this standard is applicable to design and construction, not to the operating phase of nuclear power plants.

2.12 Section 4.7, Independent Review Personnel.

The reference to ANSI/ANS-3.2-1988 should be retained because it is the most recent revision to the standard and incorporates industry experience.

Addition comment not addressed by DG-101

The Special Requirement (2)(a) of section 4.4.2 is not required. The training program based on the SAT as described in section 6.2.1 provides the knowledge, skills, and abilities to perform effectively as a senior reactor operator. Other experience is equivalent. Examples include experience as a shift technical advisor or operator training instructor.