

DS09  
M.W. Hodges

Imesonok Technical Center  
5000 Dominion Boulevard  
Glen Allen, Virginia 23060

RECEIVED  
1996 NOV 20 AM 9:00  
RULES REVIEW & DIR. BR.  
USNRC

61FR 52977  
Oct. 9, 1996



(2)

VIRGINIA POWER

November 15, 1996

Rules Review and Directives Branch  
DFIPS  
Office of Administration  
US Nuclear Regulatory Commission  
Washington, DC 20555

Serial No. GL 96-097

Gentlemen:

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

Virginia Power has completed a review of draft regulatory guide DG-1012, "Qualification and Training of Personnel for Nuclear Power Plants." Enclosed are our comments provided in Attachment 1 for your consideration.

We appreciate the opportunity to comment on the draft regulatory guide. Should you have any additional questions, please feel free to contact us.

Very truly yours,

S. P. Sarver, Acting Manager  
Nuclear Licensing and Operations Support

Attachment

260058

9611260238 961115  
PDR REGGD  
XX. XXX C PDR

IBP-11 01/10/96  
M. W. Hodges

RE660

(61FR52977)

## Comments on Draft Reg Guide DG-1012

### Item 2.2 Section 4.1.4 Training

This section states that for independent review personnel, the following should replace section 6.2.2 of ANSI-3.1:

Specialized training for each individual in this category shall be based upon an analysis of the individual's background, abilities, responsibilities and the effect his area of responsibility could have on overall plant safety. Training should be provided to compensate for deficiencies identified by comparing the individual's experience and knowledge to the task analysis.

#### **Comment**

This requirement might be necessary for an organization that has a small group of people who conduct independent reviews for all areas within the power station. Analysis for an individual's technical competency should not be required for individuals who conduct independent reviews in their area of expertise only.

### Item 2.11 Section 4.6.2 Shift Technical Advisor

This section states that the STA "assumes an active role in shift activities" and defines this as performing at least three shifts per quarter as the STA.

#### **Comments**

We recommend that the proposed STA requirement of three shifts per quarter be clarified as a total hours requirement. This would allow employees working two 12-hour shifts to meet the "active role" requirements.