

27 April 1984

Mr. Hugh L. Thompson, Jr.
Director
Division of Human Factors Safety
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Hugh:

Reference is made to your recent telephone conversation during which you indicated that the NRC staff would be interested in comments I might have on recent utility industry proposals in response to the NRC's proposed rulemaking on training and qualifications of personnel. This was followed by your letter to me of 17 April 1984, enclosing information on the utility industry presentation to the Commissioners on 9 April 1984.

Attached is a typed copy of the comments that I telephoned in to your office on 26 April 1984.

Sincerely yours,

Forrest J. Remick

FJR:gc

Enclosure

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Comments by F. J. Remick on
Training and Qualification of Nuclear Power Plant Personnel
In Response to NRC Staff Request

- . I was surprised by the strong nuclear utility reaction to the proposed rulemaking (Sections 200-250 of 10 CFR 50).
- . I favor performance-based training (i.e., a systems approach to training) and believe that the NRC should make clear its position on training.
- . Whether the NRC position should be made through rulemaking or by policy statement, and whether one or the other is permitted or required by Section 306 of P.L. 97-425 are matters that I am not prepared to address.
- . Performance-based training is a basic ingredient of INPO accreditation.
- . The list of positions contained in Appendix B of ANSI/ANS 3.1 - 1981 is too extensive at this point in time. Industry could not comply. The INPO list is more realistic.
- . INPO accreditation should be accepted by the NRC as meeting the intent of proposed 10 CFR 50.200-250.
- . I would be extremely concerned if excessive NRC rulemaking or other actions did cause the nuclear utility industry to withdraw their commitment to and support of INPO's efforts to improve the quality of training.
- . INPO has obtained the commitment of all nuclear utilities, including their CEOs, to participate in the INPO accreditation process.
- . Through INPO, the utilities are striving for quality in training and for the pursuit of excellence in nuclear power plant operations. This goes beyond meeting regulatory requirements.

To destroy this initiative would set back training program improvements to pre-TMI-2 accident days.
- . Through regulation, the NRC cannot accomplish the commitment to quality that has been developed as a result of INPO effort and utility CEO peer pressure.
- . Accreditation is off to a good start. I believe that the NRC could not do a more effective job of accreditation.
- . If the NRC took over accreditation, I believe that the process would be set back at least 5 years.
- . In summary, in light of what I sincerely believe are laudable utility industry initiatives for the improvement of training, I recommend that at this time the Commission act in a manner which results in a minimum amount of requirements, a limited amount of prescriptive guidance, a prudent amount of monitoring, and a maximum amount of encouragement for continued utility initiatives towards attaining quality in training and excellence in nuclear power plant operations.

- Incidentally, in response to the utility presentation to the Commission on 9 April, I consider that I am an independent member of the Accrediting Board, recommended for membership by the NRC, in contrast to an NRC representative on the Board.

F. J. Remick
26 April 1984