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PETITION RULE PRM 30-62
(64FR 57785)

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Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

AD

January 10, 2000

Secretary of the Commission
ATTN: Rulemakings and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Gentlemen:

NUCLEAR REGULATORY COMMISSION (NRC) - PETITION FOR RULEMAKING:
EMPLOYEE PROTECTION TRAINING (VOLUME 64 FEDERAL REGISTER 57785,
OCTOBER 27, 1999)

TVA appreciates the opportunity to review and comment on the subject petition for rulemaking published in the October 27, 1999 *Federal Register*. TVA participated in an industry effort with the Nuclear Energy Institute (NEI) to review the subject petition and endorses the comments transmitted to the NRC by NEI.

TVA recognizes that it is important to handle employee safety concerns properly. To ensure effective handling of concerns, TVA has provided staff training on the statutory and regulatory requirements related to permitting employees to express any concerns, safety-related or otherwise, without retaliation or the threat of retaliation. The training provided practical tips on properly addressing concerns expressed by employees. TVA also provides training that describes the agency's policy prohibiting discrimination and encouraging employees to promptly report safety conditions. TVA recognizes that this is of critical importance to the continued success of our nuclear program. However, TVA feels strongly that training on this important matter should not be the subject of federal regulation. TVA trains its managers and employees on a variety of topics related to the safe operation of its nuclear plants, and does so without NRC-imposed training requirements. Segregating and prioritizing topics for mandatory training is at best, unwise, and at worst, counterproductive. Consistent with the views of NEI, we believe it is far better public policy to let licensees develop and implement training on regulatory and other topics bearing on safe plant operation.

PDR PRM 30-62

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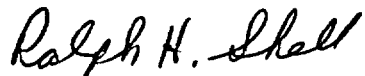
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For the reasons expressed above as well as those submitted by NEI, we believe the petition for proposed rulemaking should be denied. If you have questions regarding this response, please contact me at (423) 751-2508.

Sincerely,



^{for} Mark J. Burzynski
Manager
Nuclear Licensing

cc: U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001