

having responsibility for overall unit management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.

#### 6.2.2 Definitions

- a) Personnel reporting to the General Manager - Robinson Plant shall be identified in Section 6 of the Technical Specifications as the plant staff.
- b) Personnel reporting to the Manager - Control and Administration shall be identified in Section 6 of the Technical Specifications as the C&A staff.

#### Facility Staff

6.2.3 The Robinson Nuclear Project organization shall be subject to the following:

- a) The shift complement during hot operations shall consist of at least one Shift Foreman holding a Senior Reactor Operator's License, one Senior Control Operator holding a Senior Reactor Operator's License, two Control Operators each holding a Reactor Operator's License, two additional shift members, and one Shift Technical Advisor. If an individual that holds a Senior Reactor Operator's License also meets the Shift Technical Advisor requirements, that individual may act in both capacities.
- b) Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., Licensed Senior Operators, Licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant General Manager or his designee, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant General Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

- c) The shift complement during cold shutdown shall consist of at least one Shift Foreman holding a Senior Reactor Operator's License, one Control Operator holding a Reactor Operator's License, and one additional shift member.

- d) At least one licensed operator shall be in the control room when fuel is in the reactor.
- e) At least two licensed operators shall be present in the control room during reactor start-up, scheduled reactor shutdown, and during recovery from reactor trips.
- f) An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- g) ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator limited to fuel handling who has no other concurrent responsibilities during this operation.
- h) A plant fire brigade of at least five members shall be maintained on site at all times. This excludes three members of the minimum shift crew necessary for safe shutdown of the plant and any personnel required for other essential functions during a fire emergency.
- i) The shift complement may be one less than the minimum requirement of Section 6.2.3.a and 6.2.3.b for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift members provided immediate action is taken to restore the shift complement to within the minimum requirements of Section 6.2.3.a and 6.2.3.b. This provision does not permit any shift member position to be unmanned upon shift change due to an oncoming shift member being late or absent.

Fire brigade may be one less than the minimum requirement of Section 6.2.3.g for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.