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AUTH. NAME AUTHOR AFFILIATION
 TUCKER, H.B. Duke Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director
 STOLZ, J.F. Operating Reactors Branch 4

SUBJECT: Forwards response to 841226 request for addl info re
 proposed request for amnd to Licenses DPR-38, DPR-47 &
 DPR-55, changing Tech Specs for working hour limits.

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HAL B. TUCKER
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January 25, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. J. F. Stolz, Chief
Operating Reactors Branch No. 4

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Sir:

By a December 26, 1984 letter, you requested additional information concerning Duke's proposed Amendment request to Oconee's Technical Specification for working hour limits. Please find attached Duke's response.

Very truly yours,

H. B. Tucker / slb

Hal B. Tucker

PFG:slb

Attachment

cc: Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Mr. J. C. Bryant
NRC Resident Inspector
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Ms. Helen Nicolaras
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Duke Power Company
Oconee Nuclear Station

Request for Additional Information
Response

Request 1: Please state whether the Health Physicist position at your plant is considered safety-related and provide the basis for your position.

Response 1: The only HP activities considered safety-related at the station are related to the operation of the Post-Accident Gaseous Sampling System.

Request 2: Please describe how you currently limit the working hours of station personnel to prevent excessive overtime. As a minimum your description should address the following points:

- a. Is your current practice limited to employees who perform safety-related functions?
- b. What are your current numerical working-hour limits?
- c. What management positions are authorized to approve overtime beyond these limits?
- d. What management positions review employee working-hour data to verify compliance with working-hour limits, and how often are the reviews performed?
- e. Do you use formal or informal methods to approve overtime, to keep track of overtime, and to review compliance with working-hour limits?
- f. How long has your current practice been in use?

Response 2: Station Directive 2.1.5 (attached) currently provides guidance for the control of all personnel working hours at Oconee. Controls affecting personnel performing safety-related work, and management reviews and authorizations are addressed in this directive.

- a. The Directive (S.D. 2.1.5) applies to all personnel performing work at the Station.
- b. The current numerical working-hour limits are specified in Sections 5.1, 5.2, 5.3 and 5.4 of Station Directive 2.1.5.

- c. The management positions authorized to approve overtime limits are specified in Sections 5.1, 5.2, 5.3 and 5.4 of Station Directive 2.1.5.
- d. The responsibility for review and verification of compliance with working-hour limits is specified in Section Directive 2.1.5. The reviews of non-exempt personnel time sheet is performed weekly, for exempt employees the review is performed monthly.
- e. Weekly time-sheet reviews for non-exempt personnel and monthly supplemental pay reviews for exempt employees are the formal methods used for compliance with the stated guidelines; the on-going supervisor knowledge of employee work schedules constitutes an informal method of control.
- f. Station Directive 2.1.5 was initially approved for use on December 1, 1984. Previously, control of working-hours for Operations personnel was addressed by Station Directive 3.1.33, Rules of Practice, which was initially approved on February 28, 1980.

Request 3: Please state whether you plan to incorporate the working-hour limits from Generic Letter 82-16 in your station procedures.

Response 3: The working-hours limits have been incorporated in Station Directive 2.1.5. Station Directive 3.1.33 has been deleted, with control of working-hours for Operations personnel now addressed in Operations Management Procedure 1-2.

ATTACHMENT

Oconee Nuclear Station Directive 2.1.5

Approval M. J. Jackson

Original Date 12/1/81

Revised Date —

DUKE POWER COMPANY

OCONEE NUCLEAR STATION

LIMITING WORK HOURS

1.0 Purpose

Prescribe a program for controlling excessive working hours of station personnel.

2.0 References

- 2.1 Technical Specification 6.4.3 (Proposed)
- 2.2 NUREG 0737, Clarification of TMI Action Plan Requirements (Item I.A.1.3)
- 2.3 NRC Generic Letter 82-12, Nuclear Power Plant Staff Working Hours, June 15, 1982
- 2.4 IE Circular 80-02, Nuclear Power Plant Staff Working Hours, February 1, 1980

3.0 Applicability

This directive applies to all personnel performing work at the Station.

4.0 Responsibilities

- 4.1 It is the responsibility of each individual to maintain his or her work hours within the below noted guidelines. If a situation exists or develops which will require deviation from the guidelines, each individual must notify his or her supervision.
- 4.2 Supervisory personnel are responsible for controlling the work hours of their personnel within the below noted guidelines. Supervisory personnel are also responsible for obtaining the appropriate approvals to authorize deviation from the guidelines.

5.0 Guidelines

- 5.1 Second level management, i.e., Coordinators, Shift Supervisors, Support Engineers authorize their employees to work in excess of 80 hours for each employee in any two (2) week pay period not to exceed 100 hours.
- 5.2 Section Heads may authorize their employees to work in excess of 100 hours for each employee in any two (2) week pay period not to exceed 120 hours.
- 5.3 Superintendents may authorize their employees to work in excess of 120 hours for each employee in any two (2) week pay period. The Station Manager will be informed of this authorization.
- 5.4 The following requirements are applicable to employees performing safety-related (QA Condition 1) work. For the purposes of these requirements, safety-related work is defined as the performance of safety-related functions pursuant to "A" designated procedures. Examples of personnel who perform safety-related functions would be Senior Reactor Operators, Reactor Operators, Nuclear Equipment Operators, certain Maintenance personnel, etc.
 - 5.4.1 Except as allowed in 5.4.2 working hours shall be limited as follows:
 - a. An individual shall not be permitted to work more than 16 hours straight (excluding shift turnover time).
 - b. An individual shall 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 seven day period (all excluding shift turnover time).
 - c. A break of at least eight hours shall be allowed between work periods (including shift turnover time).
 - d. Except during extended shutdown periods, the use of overtime shall be considered on an individual basis and not for the entire staff on shift.
 - 5.4.2 A deviation from 5.4.1 shall be approved by the Station Manager (or designee). This approval shall be documented with the basis for granting the deviation. Routine deviation from 5.4.1 is not authorized.

- 5.4.3 Time sheets (non-exempt personnel) will be reviewed to assure conformance with 5.4.1. Supplemental pay records for exempt personnel will be reviewed to assure conformance with 5.4.1. Supervisory personnel are hereby designated to perform this review.

6.0 Documentation

- 6.1 No documentation is required for items 5.1, 5.2, and 5.3.
- 6.2 Documentation associated with 5.4.2 will be maintained available for NRC review for a period of two (2) years.