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CRUTCHFIELD,D. Operating Reactors Branch 5

SUBJECT: Submits plans,schedules & commitments in response to 800731 ltr re shift staffing interim criteria.Will comply w/shift staffing criteria by 820701.Plans established for required licensed personnel.

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October 13, 1980

Director of Nuclear Reactor Regulation
ATTN: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Shift staffing interim criteria
R. E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

Dear Mr. Crutchfield:

This letter is a response to Mr. D. G. Eisenhut's July 31, 1980 letter which provided interim shift staffing criteria and guidelines for scheduling of overtime. The following plans, schedules and commitments are provided in response to the criteria on shift staffing. We will comply with the shift staffing criteria by July 1, 1982. The following plans have been established to provide the required licensed personnel.

1. Mid-December, 1980 - Three new reactor operator (R.O.) licenses will be added (dependent on passing the U.S.N.R.C. examination), making a total of 12 Senior Reactor Operator (S.R.O.) licenses and 10 R.O. licenses.

2. January, 1981 - The loss of one S.R.O. license from shift will make a total of 11 S.R.O. licenses and 10 R.O. licenses.

3. Mid-1981 - Three new R. O. licenses (dependent on passing the U.S.N.R.C. examination) WITH the removal of three R.O. licenses for S.R.O. license training. The net result will be a total of 11 S.R.O. licenses and 10 R.O. licenses.

4. By July 1, 1982 - Three new S.R.O. licenses (dependent on passing the U.S.N.R.C. examination) will make a total of 14 S.R.O. licenses and 10 R.O. licenses. This will provide sufficient S.R.O. and R.O. licenses to meet the interim shift staffing criteria and sufficient extra licenses (4) to cover any unexpected loss of personnel.

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DATE October 13, 1980

TO Director of Nuclear Reactor Regulation
ATTN: Mr. Dennis M. Crutchfield, Chief

It should be noted that the limit on the number of personnel preparing in the program for licenses is based on three factors. The first is the U.S.N.R.C. training requirement that operators be removed from all shift duties for an extensive period of time prior to taking the U.S.N.R.C. examination. The second is the lack of qualified Auxiliary Operators to replace the Auxiliary Operators removed from shift. The third is the large number of personnel enrolled in the Rochester Institute of Technology academic upgrade program described in our December 28, 1979 letter to Mr. D. Ziemann. This program is presently intended to address the long range criteria on college level achievement for S.R.O. license holders given in Mr. H. R. Denton's March 26, 1980 letter. Auxiliary Operators are included in the program. This program has the effect of interfering with scheduling arrangements to place additional Auxiliary Operators in the license training.

We wish, also, to respond to the portion of the letter concerning overtime work for licensed control room personnel and Shift Technical Advisors. We intend to develop a work rule administrative procedure which will establish the following policies.

1. An individual shall not be permitted to work more than 16 hours straight (not including shift turnover or lunch relief time).

2. An individual shall not be permitted to work more than 24 hours in any 48 hour period (not including shift turnover or lunch relief time).

3. An individual shall not work more than 72 hours in any pay week (not including shift turnover or lunch relief time).

4. An individual shall not work more than 14 consecutive days without having two consecutive days off.

5. The shift working during the change from Eastern Daylight Savings Time to Standard Time will be considered to have worked 8 hours.

6. The hours worked by licensed personnel participating in plant evolution in order to observe completion of the evolution to provide necessary operational experience are excluded from the calculation of the total number of hours permitted.

7. The hours required for license training, license retraining and the R.I.T. Training Program are excluded from the calculation of the total number of hours permitted.

8. The hours worked by licensed Auxiliary Operators that do not require use of their license are excluded from the calculation of the total number of hours permitted. In other words, time worked by a licensed operator as an Auxiliary Operator will not be included in the total permitted.

We understand the U.S.N.R.C. concern for limiting overtime for these personnel and we are responding to this need. Since January 1980 we have increased the number of operations shift personnel from 34 to 40. We will continue to endeavor to minimize overtime for these personnel; however, we cannot commit to all the restrictions as given in Mr. Eisenhut's letter for reasons given below.

1. The total amount of paid days off for our current licensed operators is 275 vacation days and 209 holiday per year for a total of 484 days. The use of the twelve-hour rule would limit the number of operators able to take off during any given week. This would have the effect that there would be insufficient overtime available to meet current holiday and vacation benefits during periods normally used for vacation. The historic corporate policy has been that overtime has been scheduled based on the 16-hour rule.

   Our present practice is that when an individual is scheduled to work more than twelve hours in a day he is relieved from his on-duty station for one hour at about the end of his first eight hours on duty. This provides the individual with a change of scene and relief as opposed to working more than twelve straight hours at a duty station. Administrative procedures have been in place to provide temporary relief to an operator by another licensed operator as the need and/or request occurs.

2. Until increased numbers of licensed personnel are available, increased simulator time requirements will continue to create an additional need for overtime replacement.

3. In order to facilitate the establishment of Operator Requalification Training in four uninterrupted training days each training period, the shift schedule was changed in 1974 from five consecutive days each week to one in which the operators work seven days on the 0000-0800 hour shift, seven days on 1600-2400 hour shift, six days on 0800-1600 hour shift and five days from 0800 to 1600 hours during their training week. This schedule is arranged so that no more than 40 hours straight time is worked each week. For this schedule the 72-hour restriction is more appropriate in any pay period than in any 7 day period.

4. The current policy of licensed operators participating in plant evolutions on overtime should continue. Under the 12-hour rule they may be unable to see a complete evolution. Their overtime would have to be dedicated as a replacement for vacations and holidays.

5. Those licensed control personnel currently enrolled in the Rochester Institute of Technology Academic Upgrade Program discussed above are compensated for the time in class as Company policy for this program; however, we will not consider it as accrued overtime because it is a voluntary educational endeavor conducted by an accredited educational institution.

We wish to express our desire to comply with the intent to limit overtime for control room licensed personnel and Shift Technical Advisors, and we hope you will consider the above discussion in evaluating our work rule policies. In order to confirm the acceptability of our plans and to eliminate possible misunderstanding during future inspections by the Office of Inspection and Enforcement, we would appreciate a written response or an opportunity to meet and discuss our plans with you or your staff.

Very truly yours,

L. D. White, Jr.

L. D. White, Jr.