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 CRUTCHFIELD, D. Operating Reactors Branch 5

SUBJECT: Forwards revised Attachment B to Safety analysis for administrative procedures re 830413 proposed Tech Spec change to incorporate NUREG-0737 limitation on plant staff working hours.

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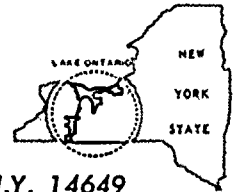
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August 12, 1983

Director of Nuclear Reactor Regulation
Attention: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch No. 5
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Plant Staff Working Hours
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

A Rochester Gas and Electric Application for Amendment dated April 13, 1983 included a proposed Technical Specification change to incorporate NUREG-0737 limitations on plant staff working hours. Discussions with NRC Staff members Messrs. Lazarus and Dick have indicated that the proposed change is acceptable provided that an understanding is reached regarding the administrative procedures to be used to implement the Technical Specification. Guidelines for the administrative procedures were included in the safety analysis, Attachment B, accompanying the Application. RG&E has agreed to change and clarify some of those guidelines and a revised Attachment B is enclosed with this letter. In addition, RG&E will submit to the NRC any changes to these guidelines which may be made in the future.

Very truly yours,


John E. Maier

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ATTACHMENT B

Safety Analysis

The reporting requirements of Technical Specification 6.9 are revised, in response to a letter dated September 20, 1982 from Darrel Eisenhut to all pressurized power reactor licensees, to include challenges to and failures of the pressurizer PORVs and safety valves. Challenges to these valves will be reported at least as frequently as annually; failures of any of these valves are to be reported under prompt notification requirements. These reporting specifications are those requested by the NRC staff to meet NUREG-0737 requirements. The additional reporting will not have a significant impact upon plant safety.

Technical Specification 6.2.2 is revised to require that procedures be implemented to limit the working hours of unit staff performing safety related work. The procedures to be developed will be based upon the guidance in the NRC Policy Statement on working hours. Specific guidance already approved by the Plant Operations Review Committee (PORC) for inclusion in the procedures are given below. These guidelines may be changed by PORC as required by plant specific needs, however, the objective will remain to maintain safe plant operation by limiting fatigue of plant staff who perform safety related functions.

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover and lunch relief time.
2. An individual should not be permitted to work more than 24 hours in any 48-hour period, nor more than 72 hours in any pay week both excluding shift turnover and lunch relief time. A pay week is specified as the period against which the 72 hour restriction is tolled, instead of a 7 day period, to ease the administration of this policy. The intent, however, is to approximate the NRC Policy Statement restriction of working no more than 72 hours in a 7 day period. Work records will be audited periodically to assure that the work schedules are not routinely arranged to circumvent the intent of the policy. It is recognized that deviations from the policy may occasionally occur.
3. A break of at least eight hours should be allowed between work periods, including shift turnover and lunch relief 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 scheduled deviation from the above guidelines shall be authorized by the Ginna Station Superintendent (or his designee per Technical Specification 6.1), Assistant Superintendent, or higher levels of management. Deviations from the above guidelines may be granted by the Shift Supervisor to cover emergency situations. Emergency situations may include an illness that strikes an employee while on duty, an accident that prevents an employee from reporting to work or short duration emergency maintenance that is necessary to restore required systems to operable status. Deviations from the guidelines shall be authorized 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 Station Superintendent or his designee to assure that excessive hours have not been assigned.

The hours worked by personnel participating in plant evolutions, in order to complete the evolution and to provide necessary operational experience, are excluded from the calculation of the total hours permitted above.

The hours for which no hourly reimbursement is given and the hours required for training, retraining or the RIT Training program are excluded from the total hours permitted above. Personnel working during the change from Eastern Daylight Savings Time to Standard Time will be considered to have worked 8 hours.

Shift Technical Advisors who sleep in at the plant and are on call are exempted from the hourly requirements.

Key maintenance personnel, as used in this specification, shall be defined consistent with NRC Generic Letter 83-14. That is, key maintenance personnel are those personnel who are responsible for the correct performance of maintenance, repair, modification or calibration of safety related structures, systems or components and who are personnel performing or immediately supervising the performance of such activities.

Procedures which are implemented consistent with these guidelines should have a positive influence on plant safety by limiting staff fatigue. More stringent limitations may dilute the plant staff and result in no real benefit.

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