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 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
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 KOBER, R. W. Rochester Gas & Electric Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 CRUTCHFIELD, D. Operating Reactors Branch 5

SUBJECT: Requests exemption from requirement for two senior reactor operators (SRO) to be on shift except when in cold or refueling conditions & exemption from one SRO in control room, except in cold or refueling conditions until 840703.

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 TITLE: Operator Requalification Program

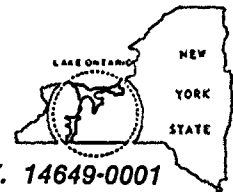
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ROGER W. KOBER
VICE PRESIDENT
ELECTRIC & STEAM PRODUCTION

TELEPHONE
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February 10, 1984

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: Shift Staffing Requirements
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

Effective January 1, 1984, 10 CFR Section 50.54 (m) (2) established on-shift staffing requirements for nuclear power plants. Except during cold or refueling conditions, each single unit facility, such as Ginna, is now required to have 2 SROs and 2 ROs on shift. During cold or refueling conditions, 1 SRO and 1 RO are required. Based on preplanned additions to the station complement, Ginna was able to comply with this requirement. Based on more recent activities, we now seek immediate relief from the requirement for 2 SROs on shift during plant conditions other than cold or refueling shutdown for the period of time until July 3, 1984. With only one SRO on shift, it may be necessary for that SRO to be absent from the control room for portions of a shift, although he will still be available to be in the control room within a short period of time. Thus, we also seek an exemption from the requirement that one SRO be in the control room at all times when the plant is in a condition other than cold or refueling shutdown. We will continue to meet all other requirements of 50.54 (m) (2) and will continue to meet all requirements of our Technical Specifications.

The circumstances which necessitate this request involve recent NRC Region I programmatic reviews of our operator requalification program. As a result of these reviews, additional actions are being required of us involving further evaluation and testing of our licensed operators. In order to accomplish this evaluation and testing, it is necessary for more than the normal number of licensed operators to be off shift. There are sufficient licensed operators at Ginna that the shift staffing requirements for ROs can be met, however, there are not sufficient individuals holding SROs to permit us to meet the requirements of 50.54 (m) (2) while still minimizing overtime in accordance with other commitments. It should be noted that, while there may be revisions to our requalification program, we are confident that our operators are

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1. The first part of the report is a summary of the work done during the year. It includes a list of the projects completed and a brief description of the results. The second part is a detailed account of the work done on each project. It includes a description of the objectives, the methods used, and the results obtained. The third part is a discussion of the results and a comparison with the results of other projects. The fourth part is a conclusion and a list of references.

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fully qualified to perform their duties and that our overall requalification program is adequate. We do have reservations about the manner in which the Regional review was conducted which we believe adversely affected the results of the review. We are continuing to review this area both to identify any desired revisions in our programs and to offer any constructive comments on the conduct of future such reviews.

The circumstances surrounding this request could not have been reasonably foreseen. The NRC did not apprise us of the overall results of their reviews until Friday February 3, 1984. Preparation of an action plan at RG&E began that same evening and continued through the weekend. Initial RG&E responses to the NRC results were reviewed by RG&E management February 7, with the first stages of our response put in place that evening. The need for this request could not have been foreseen and its preparation has been expedited.

The period of time to July 3, 1984 was selected as appropriate for the request since it is brief yet permits us to conduct a full review and assessment of our requalification program. July 3rd has been selected since a normal shift rotation occurs that date. We believe that at the conclusion of this period, we will be capable of returning to full compliance. It should be noted that during the period that the exemptions would be in place, they would not be required during the time the plant is scheduled to be in cold or refueling shutdown from March 3 until approximately April 26, 1984, with the exception of approximately 5 days during this period for steam generator crevice cleaning.

We believe that an exemption from the staffing requirements is preferable to other alternatives. One alternative is to reduce the number of shifts from five to four. This would severely impact the current requalification and retraining program and would be diametrically opposite to the goal of a quality training program. Further, it could result in a significant increase in the hours worked, perhaps contrary to the staff overtime commitments. Another alternative is to place plant staff members who hold SRO licenses on shift. This is undesirable for several reasons. In general, they are intimately involved in various facets of preparation for our Spring outage. Removing them from these duties would, we believe, adversely impact the ability to perform outage tasks in a well planned and coordinated fashion. Tasks include modification installation and testing, maintenance, inspections, and refueling. After the outage, followup activities from the outage such as startup testing of modifications, completion of evaluations would be adversely impacted.

During the time that the exemption is in place, a number of factors will mitigate its impact. First, the time period is short, particularly considering that no relief is necessary from the 2 SRO requirement during the Spring refueling outage. Second, when the plant is above cold shutdown, a Shift Technical Advisor (STA) is on shift. Of the ten STAs, three currently hold SRO licenses, and one will be completing training and is scheduled to take the exam in

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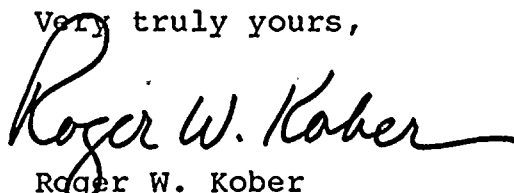
March. While this does not provide a second SRO for each shift, it provides compensation on a number of shifts. It should be noted that these individuals have other duties, some involving operational input into modification design, installation and testing, and thus cannot be devoted full time to shift duties. A further factor is that we expect to have 3 ROs instead of the minimum of 2 on a number of shifts. While some of these people may be on a training cycle as part of meeting the criteria for a SRO license, they nonetheless are available on shift as required to perform a safety function or otherwise to assist in the safe operation of the facility. Finally, during normal day shifts and during some shifts immediately before and following the outage, additional SRO licensed individuals will be present at the plant. These include, for example, individuals participating in modifications, plant systems startup, and low power physics testing.

Exemption from the requirement that one SRO be in the control room at all times is preferable to the alternative. If only one SRO is on shift, we believe that individual must have the flexibility to observe and assess activities in all areas of the plant as the need arises. To restrict the person from personally assessing the various areas of the plant as the need arises is undesirable and can adversely impact the person's ability to manage the facility.

The exemption from the one SRO in the control room while the plant is above cold or refueling shutdown is also mitigated by several factors. As is evident to those who have been at Ginna, it is a small, compact plant. The control room can be reached from any point in the plant in a short period of time if the situation requires it. Thus, at no time would the SRO be very far from the control room. Also, many of the RO license holders have significant experience. Ginna has a low turnover rate among all employees, including the operators. Thus, although a SRO might not be present at all times, highly experienced and dedicated operators are in the control room at all times.

Therefore, we request your approval of these two exemption requests until July 3, 1984. We especially request that the approval be granted promptly since we are already conducting the additional reviews and evaluations with personnel off shift and believe that the time period without the exemption should be maintained as short as possible. We are available to provide any further information that you may require.

Very truly yours,



Roger W. Kober
Vice President
Electric and Steam Production

THE UNITED STATES OF AMERICA
DO hereby certify that
[Name] is a citizen of the United States of America
and is entitled to the rights and privileges of citizenship
under the Constitution and laws of the United States.

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of the United States of America
this [Date] day of [Month], [Year].
[Signature]
[Title]