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SUBJECT: Requests exemption from 10CFR50.55(m)(2) shift staffing requirements until 840502.Requests approval be granted so planning may be finalized.

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SUBJECT: Requests exception from Inst 90.4(b)(2) shift staffing requirements until submission approval by grantee is planned [illegible].

[illegible] ITEM: [illegible]

NOTES: [illegible]

[illegible]	[illegible]	[illegible]	[illegible]
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ROGER W. KOBER
VICE PRESIDENT
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April 3, 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 relief from the requirement for 2 SROs on shift during plant conditions other than cold or refueling shutdown for the period of time until May 21, 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

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requalification program, we are confident that our operators are fully qualified to perform their duties and that our overall requalification program is adequate. We have reviewed our requalification program and have implemented several short-term and intermediate-term programs, as described below. We are continuing to review our programs to identify any further revisions. In addition, since we had concerns that the manner in which the Regional review was conducted adversely affected the results, we have met with the NRC Staff and have offered what we believe were constructive comments on the conduct of future such reviews.

The circumstances surrounding this request could not have been reasonably forseen. 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.

A supplementary training program was initiated on March 5, 1984. This program is designed to verify topic areas within our curriculum which may need strengthening, to quantify curriculum needs and to provide supplemental training to selected individuals. Participants have been selected based on operational activities, response to plant occurrences, previous written and oral exam results, individual requests, and near-term license renewal. Three classes of eight to ten individuals each were established. The first class began on March 5, with the starting date selected to coincide with the start of the 1984 refueling outage, thereby minimizing the impact on shift staffing. The program was established to be four weeks in length. Thus, the second class was scheduled to begin on April 2. This would end on April 27, with these operators being returned to normal shift duties during the time period the plant was expected to return to service following the outage. The third group would then be scheduled for a four week period beginning in mid to late May.

During the early stages of formulation of this program, we submitted a request for exemption from the shift staffing requirements by letter dated February 10, 1984. The exemption was requested until July 3, 1984 based on our view of the program at that time. By letter dated February 22, the NRC stated, with our agreement, that approval was not necessary at that time. Rather, review of any exemption request would be more appropriate after our supplementary training program had been established and presented to the NRC.

DATE April 3, 1984
TO Mr. Dennis M. Crutchfield

Based on the actual class composition and our experience to date with the first class, we have reassessed our need for an exemption. First, the length of each class session has been extended from four weeks to five weeks. The extra week will be used for individual study to enable each student to concentrate on any specific areas. Thus, the second class will begin on April 9 and conclude on May 11. Second, the three groups have been established so that a minimum number of control room operators are in the third class which will begin after plant startup. Thus, we currently expect to be able to comply with the shift staffing requirements while the third class is in progress.

The period of time to May 21, 1984 was selected as appropriate for this request since it is brief yet permits us to conduct a full review and assessment of our requalification program. May 21 has been selected since a normal shift rotation occurs that date. Further, it permits one week after the second class ends for contingencies. For example, although not anticipated if one or more of the individuals in the second class did not meet the minimum requirements for returning to shift, a further exemption might be necessary. 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 until approximately May 2, 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 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 leaving cold shutdown during startup from the outage, followup activities from the outage such as startup testing of modifications and completion of evaluations would be adversely impacted. Modifications which will involve startup testing during this time period include, for example, the new moisture-separator reheaters. Evaluations include startup physics testing to verify core parameters.

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 has taken the necessary examinations for a SRO license but has not received the results. 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. It is impractical to require that these licensed STAs be required on shift so that no exemption is required. First, they are involved in outage activities which may extend past startup. Second, they will be involved in training for compensatory fire protection measures as a part of a review related to Appendix R to 10 CFR 50. Some of this information may not be available until later in the outage. Therefore, training of some individuals may occur after startup (but before the individual serves on shift). Finally, while we have conceptually defined the scope of these required activities, the scope may change as a result of final reviews by RG&E or the NRC. A further factor is that if we only have 1 SRO on a shift, then we will have 3 ROs instead of the minimum of 2. Finally, during normal day shifts and during some shifts immediately 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. During this period of time, the absence from the control room will be minimized, however, the final decisions must be the shift supervisor's based on the facts at hand at the time. We would typically expect this time to be on the order of 10% of the total shift although again, it may vary significantly. To restrict the person from personally assessing the various areas of the plant as the need arises is undesireable 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 (less than 5

to 10 minutes) 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 an 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 May 21, 1984. We especially request that the approval be granted promptly so that we may finalize our planning. We are available to provide any further information that you may require.

Very truly yours,

Roger W. Kober

Roger W. Kober