

- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips caused by transients or emergencies.
- d. All core alterations shall be directly supervised by either a licensed Senior Reactor Operator or Senior reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- f. A Fire Brigade of 5 members shall be maintained on site at all times.* This excludes the two members of the minimum shift crew necessary for safe shutdown.
- g. Adequate shift coverage shall be maintained without routine heavy use of overtime. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions including senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel.

*Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours to accommodate unexpected absence of Fire Brigade members provided immediate action is taken to restore the Fire Brigade to the minimum requirements.

performed during the refueling outage may be reported in the monthly report for the month following the end of the outage rather than each month during the outage.

- c. Challenges to the pressurizer power operated relief valves or safety valves shall be reported no less frequently than on an annual basis.

6.9.2 Reportable Occurrences

Reportable occurrences, including corrective actions and measures to prevent reoccurrence, shall be reported to the NRC. Supplemental reports may be required to fully describe final resolution of occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference shall be made to the original report date.

Note: This item is intended to provide for reporting of potentially generic problems.

(10) Failure of the pressurizer PORVs or safety valves.

b. Thirty Day Written Reports. The reportable occurrences discussed below shall be the subject of written reports to the Director of the appropriate Regional Office within thirty days of occurrence of the event. The written report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- (1) Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the technical specifications but which do not prevent the fulfillment of the functional requirements of affected systems.
- (2) Conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation.

Note: Routine surveillance testing, instrument calibration, or preventative maintenance which require system configurations as described in items 2.b(1) and 2.b(2) need not be reported except where test results themselves reveal a degraded mode as described above.

- (3) Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems.

- (4) Abnormal degradation of systems other than those specified in item 2.a(3) above designed to contain radioactive material resulting from the fission process.

Note: Sealed sources or calibration sources are not included under this item. Leakage of valve packing or gaskets within the limitations for identified leakage set forth in technical specifications need not be reported under this item.

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. Except during extended shutdown periods, 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.
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.
5. During extended shutdowns an individual should not be permitted to work more than 14 consecutive days without having at least one day off.

Any deviation from the above guidelines shall be authorized by the Shift Supervisor for Operations personnel, or higher levels of management for other key personnel, 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.

