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 MAIER, J.E. Rochester Gas & Electric Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 CRUTCHFIELD, D. Operating Reactors Branch 5

SUBJECT: Recommends that Tech Spec re shift manning requirements not
 be imposed until Sept 1983, per TMI Action Plan Item
 I.A.1.3.1. Implementation schedule will be contingent upon
 results of Apr 1982 license exams.

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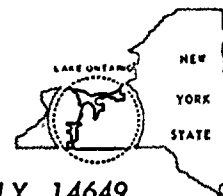
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February 1, 1982

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



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

Dear Mr. Crutchfield:

This letter is in response to your request for Rochester Gas and Electric Corporation to review the implementation schedule to meet the "new shift manning requirements for normal operation that must be implemented by Technical Specification before July 1, 1982."

In the October 13, 1980 response by RG&E, Mr. L. D. White, Jr. to NRC, Mr. Eisenhower's July 31, 1980 letter, Rochester Gas and Electric provided you with our planned schedule to meet the July 1, 1982 criteria.

Since that time, we have lost one shift senior reactor operator (SRO) due to termination of employment with Rochester Gas and Electric and two other SRO's have health problems which might affect their availability for performing licensed activities.

We have also gained five reactor operator (RO) licenses and presently have three SRO and two RO candidates scheduled to be examined in April, 1982.

Contingent upon the results of April examination, we should be able to normally meet the NRC license criteria with 13 SRO licenses and 11 RO licenses.

It must also be added that there will not be sufficient depth within the licensed shift organization to assure the criteria will be met if there is an unexpected loss of licensed personnel or a high failure rate during the April, 1982 examinations.

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ROCHESTER GAS AND ELECTRIC CORP.

SHEET NO. 2

DATE February 1, 1982

TO Director of Nuclear Reactor Regulation

Presently, we are planning on six shift personnel being examined for RO licenses in December, 1982. We also plan on three more shift personnel being examined for SRO licenses in July, 1983.

Based on this schedule, it is appropriate to assume we will have sufficient licenses to meet the license criteria in full by September, 1983.

Rochester Gas and Electric Corporation would like to propose (contingent upon minimum licensing success in April and December of 1982 and July, 1983) that the July, 1982 commitment be that the shift complement should normally include two SRO's and two RO's.

The Technical Specification shift license requirement for each shift should not be imposed until September, 1983 for Ginna Station. Any earlier implementation would require an inappropriate amount of overtime of licensed operations personnel to cover vacation, illness and training periods. This would be contrary to the request of TMI action plan, Item I.A.1.3.1.

Very truly yours,


John E. Maier

