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CRUTCHFIELD,D. Operating Reactors Branch 5

SUBJECT: Responds to 810218 guidance re emergency respons on-shift & call-in staffing.Shift staffing increase will be completed by 820701.Existing call-in procedures & proximity of corporate support provides addl staffing capability.

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May 1, 1981

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: Emergency Response Capability
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

This letter is in response to a letter dated February 18, 1981 from Mr. Darrell Eisenhut and supplements our letter dated April 3, 1981 regarding emergency support facilities and plant staffing. Mr. Eisenhut's letter provided guidance for staffing both on-shift and on a call-in basis.

Our current minimum shift complement includes five operators, an STA, and a health physics/chemistry technician. Normally, an additional (sixth) operator is on shift. In our letter dated October 13, 1980 we described steps being taken to increase the minimum number of operators on shift to six. Thus, as described in our letter, we expect to have six operators (2 SRO, 2 RO, and 2 auxiliary operators) plus an STA and a health physics/chemistry technician on each shift. In response to the February 18 letter, we will provide one additional person on each shift to be responsible for notification/communication. This individual may be another auxiliary operator, a co-op student, an STA in training, a clerk/typist or other comparable person. The individual will be provided training commensurate with the position of notification/communication. We expect to provide this additional person by September 1, 1981. Thus, the total minimum shift complement will be 8 people by September 1, 1981 and 9 people by July 1, 1982. It should be noted, that these commitments apply only when the reactor coolant temperature is above 200°F. Below 200°F, i.e. at cold or refueling shutdown, the existing Technical Specification requirements apply.

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We have reviewed the other positions indicated in the NRC guidance. The licensed operators on shift are capable of performing minor electrical and mechanical maintenance on shift. This could include replacing fuses, tightening valve packing, etc. This provides the capability for repair and corrective actions. The licensed operators have received radiation protection training as part of their license training and can provide that capability if required. The Ginna health physics/chemistry technicians have the training and expertise to provide radiation surveys and radio-chemistry/chemistry analysis. The Shift Supervisor acts as Emergency Coordinator until arrival on site of another qualified individual. Firefighting and rescue/first aid capability is provided by on shift personnel. Thus, we see no need to further add to the shift complement to accomplish other functions identified in the February 18, 1981 letter.

Mr. Eisenhut's letter identified staffing to be on site within 30 minutes and 60 minutes. We believe that it is not practical to comply with this request. It is not practical because such a requirement would necessitate a corporate policy regarding where station personnel could live. Further, to implement the 30 minute staffing criteria at this time would undoubtedly require that a number of station personnel move their residence closer to Ginna. Such a policy simply would not succeed. In addition, detailed requirements, if rigidly imposed, could only result in requiring an inordinately large permanent station staff. It is likely that such requirements could not be met with any reasonable assurance, given the critical shortage of trained personnel in many nuclear plant areas of expertise, for example, in the health physics area.

The addition of personnel on a call-in basis has previously been described in our Emergency Plan, submitted by letter dated December 30, 1980. As described there, experience during emergency plan drills has shown that substantial numbers of station personnel are able to report to the station within one hour of initiation of an unannounced drill. These personnel are representative of all skills present within station staff. Thus, it is likely that within one hour sufficient station personnel would be available to perform required tasks.

Support for Ginna Station is also provided from non station personnel. Appropriate arrangements have been made with area fire departments and ambulance organizations. Due to the proximity of the corporate offices to Ginna Station, (less than 20 miles), support is available from a broad array of corporate departments, such as engineering, general maintenance, electric substation, and relay departments. Many of these non-station personnel are familiar with Ginna and its practices. Finally, agreements are in the final approval stage with Niagara Mohawk Power Corporation and the Power Authority of the State of New York to mutually support emergencies at the Ginna and Nine Mile Point sites. Although not available within 60 minutes, such assistance would be useful in a somewhat more extended emergency.

In summary, additional staffing will be provided on shift. Existing call-in procedures, coupled with the proximity of corporate support will provide additional staffing capabilities.

Very truly yours,

John E. Maier

J. E. Maier