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SCHWENCER,A. Licensing Branch 2

SUBJECT: Forwards revisions to min shift crew & staffing plan, reflecting 820208 Generic Ltr 82-02, "Nuclear Power Plant Staff Working Hours," guidelines.

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Docket No. 50-397

Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Schwencer:

Subject: NUCLEAR PROJECT NO. 2
TMI APPENDIX B, SECTION I.A.1.3

Reference: NRC Generic Letter 82-02, "Nuclear Power Plant Staff Working Hours", dated February 8, 1982

During recent telephone conversations between Messrs. R. Auluck and F. Allenspach (NRC staff) and Messrs. R.M. Nelson, P.L. Powell and R.L. Corcoran (Supply System), it was requested that our position on "Minimum Shift Crew" and "Staffing Plan" be reviewed to reflect the guidelines of the referenced NRC generic letter. Accordingly, the revisions indicated in the attachment will be incorporated into Appendix B of the WNP-2 FSAR in a future amendment.

Very truly yours,

GD Bouchey

G. D. Bouchey
Deputy Director, Safety and Security

KP/jca
Attachment

cc: F Allenspach - NRC
R Auluck - NRC
WS Chin - BPA
R Feil - NRC Site

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WNP-2

WNP-2 Position

Minimum Shift Crew

Minimum shift crews at WNP-2 will be as specified by technical specifications; it is planned the minimum shift crew will consist of:

a. One shift manager with a senior reactor operators' license (SRO) on site at all times the reactor contains fuel.

b. A control room supervisor with a senior operators' license (SRO) in the control room at all times when the reactor is in power operation, startup or hot shutdown (conditions 1, 2 and 3). This control room supervisor may, from time to time, be relieved by the shift manager or by any other SRO except the shift technical advisor.

c. A licensed reactor operator (RO) in the control room at all times when the reactor contains fuel.

d. One additional licensed reactor operator (RO) shall be on site at all times when the reactor is in power operation, startup or hot shutdown (conditions 1, 2, and 3). This individual may serve as relief operator for the control room when the reactor is operating.

e. Two equipment (non-licensed) operators shall be on the site at all times when the reactor is in power operation, startup or hot shutdown. At least one equipment operator shall be on site at all times when the reactor contains fuel.

f. One shift technical advisor, if required, (see I.A.1.1) on site at all times when the reactor is in power operation, startup or hot shutdown.

g. During core alterations an additional licensed senior reactor operator (SRO) or limited senior reactor operator (SROL) to directly supervise the core alterations.

h. One health physics technician* on site at all times fuel is in the reactor.

i. A site Fire Brigade of at least 5 members shall be maintained onsite at all time*. The Fire Brigade shall not include the Shift Manager and the 3 other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.

*The health physics technician and Fire Brigade composition may be less than the minimun requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

Staffing Plan

Shift coverage is provided by utilizing a rotating shift schedule based on a 40 hour work week, 24 hour/day and 7 day/week coverage.

To assure sufficient SRO and RO licensed individuals are available for staffing the shift manager, control room supervisor and reactor operator positions on a minimum of 5 rotating shifts, the Supply System is training 17 candidates for SRO licensing and 18 for RO Licensing. Assuming 2 SRO and 2 RO license candidates are lost to attrition and 1 SRO and 2 RO license candidates fail the exam, 14 SRO and 14 RO licenses are available for staffing 6 rotating shifts (5 minimum) and for providing relief.

Policy on Factors Causing Fatigue

WNP-2 will prepare administrative procedures which establish controls to prevent situations where fatigue could reduce the ability of operating personnel to keep the reactor in a safe condition. The controls should focus on shift staffing and the use of overtime--key job-related factors that influence fatigue.

The objective of the controls would be to assure that, to the extent practicable, personnel are not assigned to shift duties while in a fatigued condition that could significantly reduce their mental alertness or their decision making capability. The controls shall apply to the plant staff who perform safety-related functions (e.g., senior reactor operators, reactor operators, health physicists, equipment operators, and key maintenance personnel).

Enough plant operating personnel should be employed to maintain adequate shift coverage without routine heavy use of overtime. However, in the event that unforeseen problems require substantial amounts of overtime to be used, on a temperary basis, the following guidelines shall be followed:

a. An individual should not be permitted to work more than 16 hours straight (excluding shift turnover time).

b. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven day period (all excluding shift turnover time).

c. A break of at least eight hours should be allowed between work periods (including shift turnover time).

d. The use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Recognizing that very unusual circumstances may arise requiring deviation from the above guidelines, such deviation shall be authorized by the Plant Manager or his delegated assistant. The paramount consideration in such authorization shall be that significant reductions in the effectiveness of operating personnel would be highly unlikely.

In addition, the administrative procedures allow licensed operators at the controls to be periodically relieved and assigned to other duties away from the control board during their tour of duty.