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SUBJECT: Provides clarification of duties of third staff reactor operator during normal & emergency plant operations.

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Docket No. 50-397

February 10, 1992
G02-92-036

J. B. Martin
Regional Administrator
Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Dear Mr. Martin

Subject: **CLARIFICATION OF CRO3 DUTIES DURING NORMAL
PLANT OPERATION**

The WNP-2 Control Room staff has six (6) administratively identified and controlled positions per Rev. 18 of PPM 1.3.1 (Conduct of Operations). These provide compliance with several important functional and Technical Specification driven commitments. These positions consist of a Shift Manager (SRO), a Control Room Supervisor (SRO), Shift Technical Advisor (Certified SRO) and three (3) Reactor Operators. Two of the Reactor Operator positions have specific control panel functions to satisfy among other commitments, our minimum at-power operation staffing. The third regular staff Reactor Operator serves as the on-shift Clearance Order Attendant and as the third Reactor Operator required by menu EOP driven mitigation strategies. In reality, staffing the Control Room with three fully qualified Reactor Operators can provide WNP-2 with the flexibility for the on-shift SRO upgrade observations without the need for additional personnel.

With this in mind, we intend to put the extra RO in observation training under the SM/CRS. He would work on his SRO qualifications during normal plant operations with no concurrent duties, but in the event of an Emergency, he would assume the duties of CRO3 and respond as directed by the CRS. In the event that the extra RO has to be used as CRO3, he will immediately come out of training status. We feel that this would not be detrimental to an SRO Upgrade's qualifications since: 1) During an actual plant emergency, the SRO trainee will not be allowed to respond as an SRO: 2) The proper place to learn how to respond, or to test a person's ability to respond to a plant emergency, is in the controlled environment of a Simulator:

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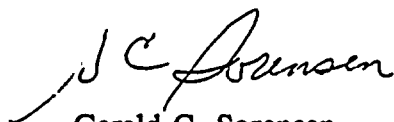
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and 3) In the event of an emergency, the on-shift SRO in training would revert to the RO function and he would be more in tune with plant status than if he had spent his shift time as CRO3.

In summary, we are not changing our commitment to staff the Control Room with 3 Licensed RO's during Modes 1,2 & 3, only clarify how the extra licensed RO will be used. Our intent is to use the extra licensed RO as an SRO trainee under the SM/CRS, with no concurrent duties. The extra RO will assume the duties of CRO3 and drop out of trainee status in the event of a plant emergency.

Very truly yours,



Gerald C. Sorensen
Manager, Regulatory Programs

RBB/GCS:jmg

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