

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos. 50-250-SP
)	50-251-SP
FLORIDA POWER & LIGHT COMPANY)	
(Turkey Point Nuclear)	(Proposed Amendments to
Generating Unit Nos. 3)	Facility Operating License
and 4))	to Permit Steam Generator
)	Repairs)

AFFIDAVIT OF GEORGE R. GRAM ON CONTENTION 2

My name is George R. Gram. I am employed by Florida Power & Light Company (FPL) as Turkey Point Site Manager, Project Management Department.

Because of my position and duties, I am personally familiar with the work force FPL plans to use in making the steam generator repairs and the availability of that work force.

This affidavit is addressed to that part of Contention 2 which states:

B. A sufficient work force, both skilled and unskilled cannot be obtained to perform the repairs without violating the limits on individual exposures contained in 10 CFR 20.101.

The currently projected peak manual manpower requirements during the steam generator repair outage is 190 persons, based upon two 10 hour shifts for a 6 day work week. Of this number, approximately 114 persons, or 60%, are estimated to be unskilled workers and approximately 76 persons, or 40%, are estimated to be skilled workers.

In addition to the projected 190 manual personnel, an estimated 110 non-manual personnel are currently projected to supervise, monitor, certify, and otherwise direct the work of these manual workers. Thus, a total of approximately 300 personnel could be involved in the repairs on any given day.

The total number of personnel who will be issued a TLD badge and dosimeter during the entire repair outage can be estimated. There will be a turnover due to workers completing their assigned work and being no longer required, and to workers quitting or being discharged. In addition, it is projected that some workers may reach their quarterly radiation exposure limit, in which case they may be reassigned to work not involving radiation exposures until the end

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of the quarter, or until they are again required after the end of the quarter. Further, non-manual and management personnel may be present on an irregular basis.

An estimate of the total number of personnel issued a TLD badge and dosimeter during the repair of one unit has been made. It was assumed that the period for the repair of one unit will be approximately 9 months, with two 10 hour shifts per day, six days per week. It was also assumed that, for the reasons indicated above, approximately 60 new persons will be issued a TLD badge and dosimeter during each 30 day period. That is, after the first 30 day period, 360 persons will have been issued a badge and dosimeter, 420 persons after the second period, and so on. This would result in a total of 840 different workers issued a badge and dosimeter for work in connection with the repair of one unit.

Given a total number of 840 persons involved in the entire 9 month outage and an estimated 2084 man-rem occupational exposure, personnel involved in the repair of one unit will receive an average of approximately 2.5 man-rem per person. This average is well within the limits of 10 CFR 20.101.

FPL is considering modifying its present plans to use four shifts of personnel working four days on and four days off to cover two 11½ hour shifts per day, seven days per week. This modification would require peak manual manpower of 340 persons. Of this number, approximately 204 persons, or 60%, are estimated to be unskilled workers and approximately 136 persons, 40%, are estimated to be skilled workers.

In addition to the projected 340 manual personnel, it is estimated that 200 non-manual personnel would supervise, monitor, certify, and otherwise direct the work of these manual workers. Thus, a total of approximately 540 personnel could be involved in the repairs on any given day if this modification of shifts is implemented.

An estimate of the total number of personnel issued a TLD badge and dosimeter during the repair of one unit was calculated if the modified work plan should be adopted. It was assumed that the period for the repair of one unit will be approximately 9 months. It was also assumed that, for the reasons indicated above, approximately 105 new persons will be issued a TLD badge and dosimeter during each 30 day period. That is, after the first 30 day period, 445 persons will have been issued a badge and dosimeter, 550 persons after the second period, and so on. This would result in a total of 1505 different workers issued a badge and dosimeter for work in connection with repair of one unit.

Given a total number of 1505 persons involved in the entire 9 month outage and an estimated 2084 man-rem occupational exposure, personnel involved in the repair of one unit will receive an average of approximately 1.4 man-rem per person. This average is well within the limits of 10 CFR 20.101.

FPL has completed numerous outages and has not experienced any appreciable difficulty in obtaining the numbers of skilled and unskilled workers needed to accomplish any outage-related work. FPL does not anticipate any difficulty in hiring a sufficient work force, both skilled and unskilled, to perform the steam generator repairs whether the work force is as presently projected or is enlarged as described in the shift modification which is now being considered and is described above.

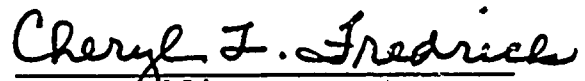
FURTHER AFFIANT SAYETH NOT.

Date April 7, 1981

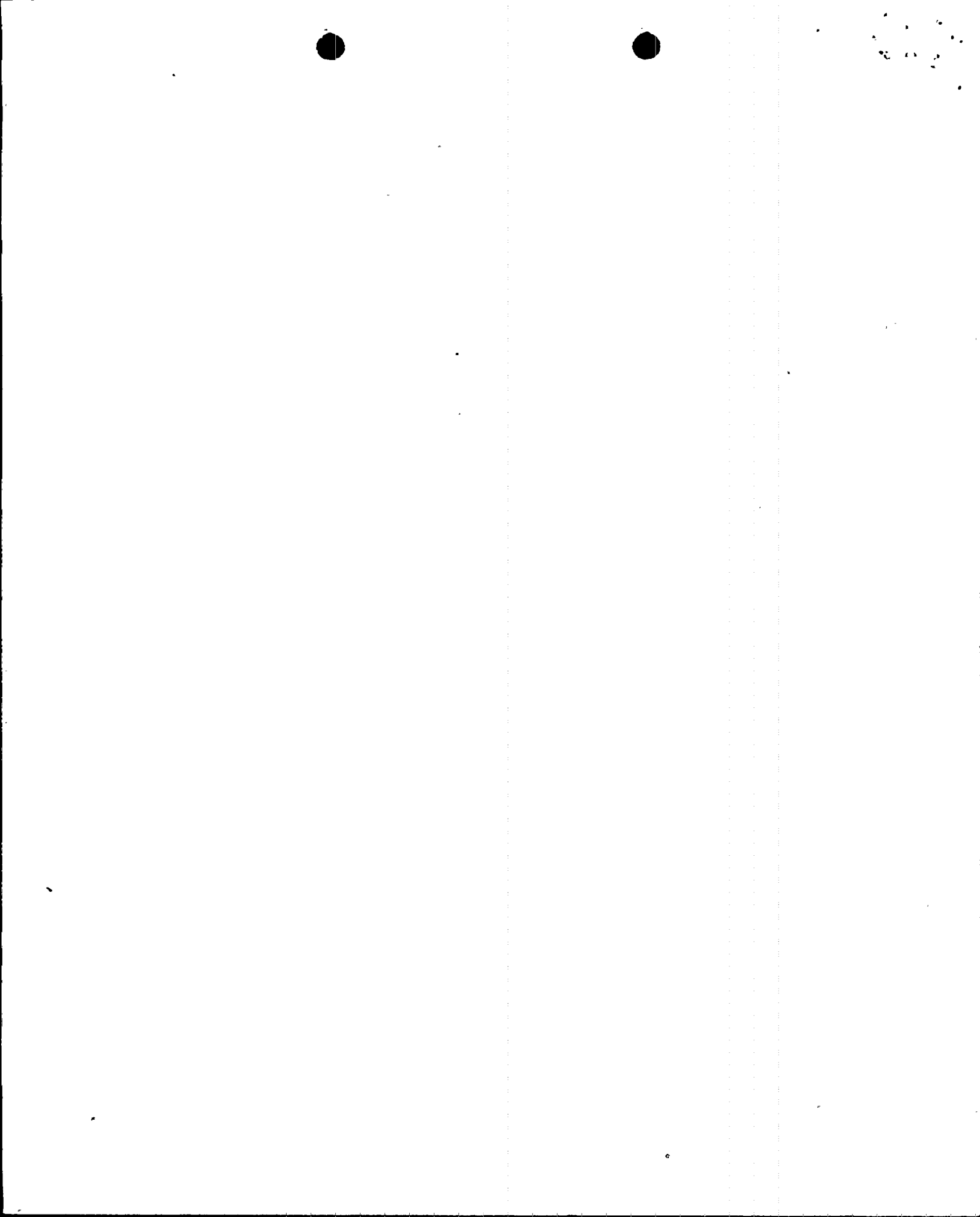

G. R. Gram

STATE OF FLORIDA)
) SS.
COUNTY OF DATE)

SWORN to and subscribed before me this 7th day
of April 1981.


Notary Public

My Commission Expires:
Notary Public, State of Florida at Large
My Commission Expires October 30, 1983
Bonded thru Maynard Bonding Agency



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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. 50-250-SP
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IN THE MATTER OF)	
FLORIDA POWER & LIGHT COMPANY)	(Proposed Amendments to
(Turkey Point Nuclear Generating))	Facility Operating
Units Nos. 3 and 4)	License to Permit Steam
		Generator Repairs)

CERTIFICATE OF SERVICE

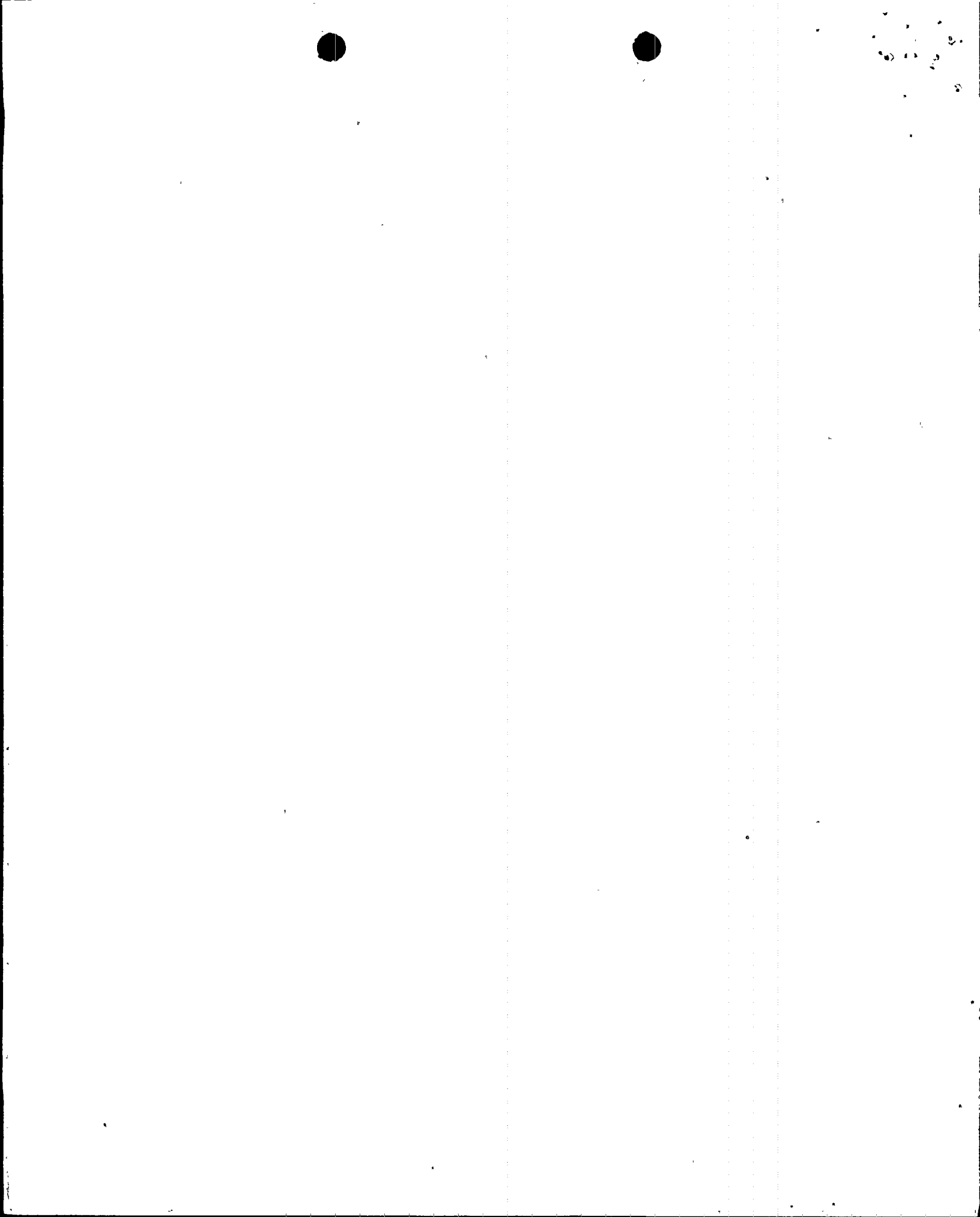
I HEREBY CERTIFY that copies of Licensee's Answer Supporting NRC Staff Motion for Summary Disposition of Contention 2 and affidavits of Harvey F. Story and George R. Gram on Contention 2 were served on the following by deposit in the United States mail, first class, properly stamped and addressed, on the date shown below:

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By


Norman A. Coll

April 13, 1981

*Additional Service By
Hand or Courier

