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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
METROPOLITAN EDISON COMPANY )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-289 SP  
(Restart)

LICENSEE'S SUPPLEMENTAL MANAGEMENT  
FINDINGS ON SHIFT STAFFING



I. Introduction

As indicated in "Licensee's Reply to Commonwealth of Pennsylvania and Aamodt Findings on Management Issues," dated June 29, 1981, subsequent to Licensee's receipt of the Commonwealth's initial findings on management issues, Licensee and Commonwealth representatives met for the purpose of resolving various differences in position. One outcome from these meetings, the additional commitments reflected in Lic. Ex. 56, already has been reported to the Board. See Licensee Reply PF 5-7. Included within the discussions between Licensee and the Commonwealth was the matter of shift staff and operational resources. Here too Licensee and the Commonwealth have resolved their differences, but this was accomplished after the filing of Licensee's June 29th Reply Findings and therefore is

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not covered therein. In accordance with the Board's ruling (Tr. at 23112) and confirmatory order of July 13, 1981, Licensee submits these supplemental proposed findings on the shift manning issue.

## II. Proposed Findings of Fact

1. The outcome of additional discussions between Licensee and the Commonwealth on the subjects of shift staffing and operational personnel are reported in a letter dated July 7, 1981, from Licensee's counsel to counsel for the Commonwealth. Lic. Ex. 59. This letter indicates that, on the basis of the further discussion between the parties, and certain additional commitments by Licensee, the shift manning concerns identified by the Commonwealth have been alleviated and the Commonwealth is withdrawing its proposed findings in this area. For its part, Licensee agreed not to object to the inclusion of any or all of its commitments, as set forth in Lic. Ex. 59, as license conditions for the restart of TMI-1.

2. The Board has reviewed the commitments of Licensee detailed in Lic. Ex. 59 and finds them acceptable. The Board also accepts withdrawal of the Commonwealth's proposed and reply findings on shift staffing and operational personnel.

3. One area of concern initially raised by the Commonwealth and not yet reviewed by the Board relates to the adequacy of operational shift manning during emergency situations. PA PF 127-30. While we understand that the

Commonwealth's concerns in this area have now been resolved, the Board briefly summarizes below the evidence of record since this issue was litigated by the parties. More general concerns as to the overall adequacy of Licensee's staffing for emergency situations is addressed in Section \_\_\_\_, infra, of this Recommended Decision. Here we treat Licensee's ability to respond during an emergency with shift manning as set forth in Lic. Ex. 59.

4. At our request, see Tr. at 20763-64, the NRC Staff was asked to report whether the possibility that there might only be one SRO-licensed operator on shift when an emergency starts had been considered in the Staff's evaluation of Licensee's onsite emergency response. A May 29, 1981 affidavit from Stephen Chesnut, the NRC reviewer responsible for evaluation of the TMI Emergency Plan, was submitted in response to this request. Staff Ex. 17, at ¶¶ 2, 4-9. Mr. Chesnut was made available for cross-examination on his affidavit, and was questioned extensively on the adequacy of Licensee's operational shift manning for emergency conditions. See generally Tr. at 22237-66, 22272-98, 22314-18, 22330-43.

5. The NRC Staff position is succinctly stated in Mr. Chesnut's affidavit (Staff Ex. 17, at ¶ 5):

I looked at the key functions to be performed by the emergency organizations and compared the Licensee's plan to determine whether an adequate assignment of personnel resources had been made. In so doing, I reached the conclusion that the Licensee's plan had properly identified the key emergency functions and properly staffed the emergency

organization to perform the functions. My conclusion in this regard was not dependent upon there being a second licensed SRO on-shift.

In explaining the basis for this conclusion, Mr. Chesnut observed that, for emergency planning purposes, it was necessary to consider the on-shift operational staffing in the context of Licensee's entire on-shift emergency response organization. Licensee's Emergency Plan calls for 20 people on-shift at all times. By comparison, the NRC Staff recommends a minimum shift staffing of 10. Tr. at 22290 (Chesnut). This excess of personnel allows this Licensee to immediately remove from the person designated as Emergency Director (i.e., the shift supervisor) some functions that other licensees place on the Emergency Director. These include radiological concerns, including dose projections and in-plant controls, as well as initial notifications. Thus, under Licensee's Emergency Plan the Emergency Director can better concentrate on operational matters; this is not necessarily the case at other plants. Tr. at 22291, 22316 (Chesnut). The Board gives considerable weight to this distinction in concluding that one on-shift SRO-licensed operator is adequate during emergency situations.

6. Nor was Mr. Chesnut able to identify any factors unique to TMI-1, either with respect to the plant or the site-specific emergency plan, that would require two SRO-licensed individuals to implement the emergency plan, while all

other operating plants are presently required to have only one SRO-licensed individual. Tr. at 22315-16 (Chesnut). To the contrary, Mr. Chesnut was of the view that Licensee's overall on-shift manning of the emergency organization was the "best I have seen. I have not seen any plan which has the level of expertise that the Licensee is planning on using." Tr. at 22291-92 (Chesnut). Mr. Chesnut's views were based on a minimum shift manning of one SRO and two RO's when the plant is operating. Tr. at 22238, 22250-52 (Chesnut). With Licensee's commitments reflected in Lic. Ex. 59, Licensee will have four licensed operators on shift when the plant is operating and the licensed SRO will be in, or within five minutes of reaching, the control room. From an emergency planning standpoint, the Board therefore does not regard as necessary that the restart of TMI-1 be conditioned with a requirement that Licensee have two SRO-licensed individuals on-shift at all times.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

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Dated: July 23, 1981.

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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| In the Matter of            | ) |                      |
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| METROPOLITAN EDISON COMPANY | ) | Docket No. 50-289 SP |
|                             | ) | (Restart)            |
| (Three Mile Island Nuclear  | ) |                      |
| Station, Unit No. 1)        | ) |                      |

CERTIFICATE OF SERVICE

The undersigned hereby certifies that four copies of the foregoing Licensee's Supplemental Management Findings on Shift Staffing were hand delivered to Administrative Judge Ivan W. Smith, and copies were served by United States mail on the other persons on the attached Service List, this 23rd day of July, 1981.

*Ernest L. Blake, Jr.*

Ernest L. Blake, Jr.  
Counsel for Licensee

Dated: July 23, 1981.

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NUCLEAR REGULATORY COMMISSION

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