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Docket Number 50-346

License Number NPF-3

Serial Number 2123

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United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Subject: Use of a Combined Senior Reactor Operator/Shift Technical
Advisor Position

Gentlemen:

The purpose of this letter is to inform the NRC of Toledo Edison's present plans for limited use of a combined Senior Reactor Operator (SRO)/Shift Technical Advisor (STA) position to meet the minimum shift staffing requirements at the Davis-Besse Nuclear Power Station (DBNPS), and the effect on the Emergency Plan. This information also updates Toledo Edison's letter Serial Number 1-580, dated September 30, 1985, which discussed training the STA to fulfill the Emergency Director function under unusual circumstances.

The NRC approved Operating License Amendment Number 175 on November 23, 1992, which revised Technical Specification 6.2.2, Facility Staff, by adding a footnote to Table 6.2-1, Minimum Shift Crew Composition. The footnote allows one of the two Technical Specification required individuals filling the SRO position to assume the STA position, provided the individual meets the qualifications for the combined SRO/STA position. This allowance is consistent with the NRC guidance provided in Generic Letter (GL) 86-04, Policy Statement on Engineering Expertise on Shift, dated February 13, 1986. The footnote also allows the option for continued use of a dedicated STA, in lieu of a combined SRO/STA.

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The STA function is currently assigned to the on-shift position of Shift Manager. Shift Managers are degreed individuals who maintain SRO licenses. Besides the Shift Manager, each shift presently has a Shift Supervisor and two Assistant Shift Supervisors. Each of these individuals also has an SRO license. Senior Reactor Operators are trained to be capable of fulfilling the Emergency Director function of the Emergency Plan.

Under the Emergency Plan, the Shift Supervisor is normally responsible for assuming the role of Emergency Director until relieved by the Emergency Response Organization. Should the Shift Supervisor become incapacitated, the Emergency Plan stipulates one of the Assistant Shift Supervisors will assume the Emergency Director duties. The present DBNPS Emergency Plan and its various Emergency Plan Implementing Procedures allow the Shift Manager/STA to normally serve as the Emergency Director only if the Shift Supervisor and one of the Assistant Shift Supervisors are unavailable.

While the change to Technical Specification 6.2.2 allows the option for the STA position to be routinely combined with one of the two required on-shift SROs, Toledo Edison intends to utilize this option only under unusual circumstances which are expected to occur infrequently. An example of its use would be to temporarily meet minimum shift staffing in accordance with Technical Specification 6.2.2 should a temporary absence of the Shift Supervisor occur due to illness. Under this circumstance, the Shift Manager/STA could fill the position and execute the responsibilities of the Shift Supervisor. In this manner, the SRO/STA would maintain the broadest perspective of plant operation should the need arise to serve as the Emergency Director. However, Toledo Edison does not intend to normally be in the situation whereby the Shift Manager/STA would need to serve as the Emergency Director should the Emergency Plan be implemented.

Toledo Edison has reviewed these plans with regards to the DBNPS Emergency Plan, particularly with regards to Section 5.1.3, Normal Plant Shift Staffing, and determined that no changes to the Emergency Plan are necessary. Accordingly, the effectiveness of the Emergency Plan is not affected.

Should you have any questions or require additional information, please contact Mr. Robert W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,



RAS/dlc

cc: A. B. Davis, Regional Administrator, NRC Region III
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