



**Commonwealth Edison**

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767

Chicago, Illinois 60690

May 4, 1982



Mr. A. Schwencer, Chief  
Licensing Branch #2  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: LaSalle County Station Units 1 and 2  
Interpretation of Technical  
Specifications - Plant Staff Working  
Hours  
NRC Docket Nos. 50-373 and 50-374

- References (a): LaSalle County Station License NPF-11,  
Appendix A, Technical Specifications,  
Section 6.1.C.
- (b): NUREG 0519, LaSalle County Station  
SER, Chapter 22, Item I.A.1.3.
- (c): D. G. Eisenhower letter dated February 8,  
1982, "Nuclear Power Plant Staff Working  
Hours" (Generic Letter No. 82-02).

Dear Mr. Schwencer:

The purpose of this letter is to provide Commonwealth Edison Company's interpretations of the Technical Specification requirements regarding staff working hours (Reference a). It is requested that you review these interpretations and provide Commonwealth Edison with an official NRC interpretation of this subject.

Item 1, Applicability - Plant Conditions

In Reference (b), the Staff specifically stated that overtime restrictions applied, "... (excluding extended periods of shutdown for refueling, major maintenance, or major plant modifications) ..."

The attachment to Reference (c), "Policy on Factors Causing Fatigue of Operating Personnel at Nuclear Reactors" sets the tone for the policy in its introductory statement that "Licensees of operating plants and applicants for operating licenses shall establish controls to prevent situations where fatigue could reduce the ability of operating personnel to keep the reactor in a safe condition."

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Based on the above two statements of applicability, Commonwealth Edison Company concludes that the Commission intends for the overtime restrictions to apply when operating personnel ability is required "to keep the reactor in a safe condition." Thus, Commonwealth Edison Company plans to enforce the limitations on working hours, as described in Technical Specification Section 6.1.C.7, during Operational Conditions 1, 2, and 3.

Item 2, Applicability - Personnel whose working hours are restricted

Reference (c) states that, "The controls shall apply to the plant staff who perform safety-related functions (e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel).

Similarly, Reference (a) states that, "Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel."

For clarification purposes, Commonwealth Edison Company has determined that the positions for which these restrictions apply are as follows:

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|-------------------------|--|
| Senior reactor operator | - Individuals with SRO fulfilling positions identified in Figure 6.1-3 and its notes.  |
| Reactor operator        | - Individuals with RO license fulfilling positions identified in Figure 6.1-3 and its notes.   |
| Health Physicists       | - Individual fulfilling the position designated as health physics technician in Technical Specification Section 6.1.C.2 (Also known as Rad/Chem technician in Commonwealth Edison stations)  |
| Auxiliary Operator      | - Individuals fulfilling positions identified as Auxiliary Operator (AO) in Figure 6.1-3 and its notes.  |
| Key Maint. Personnel    | - Individuals fulfilling maintenance positions specified in ANSI N18.1 - 1971 as Repairmen or Technicians. Specifically, the Commonwealth Edison positions are: Control Systems Technician, "A" Instrument Mechanic, Senior Nuclear Electrician, "A" Electrician, Senior Nuclear Mechanic, "A" Mechanic. |

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The above positions reflect Commonwealth Edison Company's interpretations of applicability. It is also our understanding that there have been some discussions between Region III personnel and NRR staff in this matter. The clarifications promised in Reference (c), however, appear to be lacking. In our view, the record, including the LaSalle County Station SER (Reference (b)), provides no basis for interpreting the LaSalle County Station Technical Specification in a manner other than as indicated in this letter. Because this new policy has, to the best of our knowledge, been unilaterally imposed at this time at LaSalle, thus obviating potential reference to interpretations at other licensed stations, your prompt response to our request for an official NRC interpretation is all the more important.

If there are any further questions in this matter, please contact this office.

One (1) signed original and thirty-nine (39) copies of this letter are provided for your use.

Very truly yours,

*CW Schroeder 5/4/82*

C. W. Schroeder  
Nuclear Licensing Administrator

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cc: NRC Resident Inspector - LSCS  
V. Stello, Deputy Executive Director,  
Committee to Review Generic  
Requirements

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