



Nebraska Public Power District

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September 30, 1983

Director, Nuclear Reactor Regulation
Attention: Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Licensed Operator Staffing at Cooper Nuclear Station

Reference: (1) Licensed Operator Staffing at Nuclear Power Units,
10CFR Part 50.54 (m)(2)(i)

Dear Mr. Vassallo:

The purpose of this letter is to request an extension in meeting the shift manning criteria specified in reference (1). Currently, Cooper Nuclear Station meets the licensed operator criteria of reference (1) on a five shift basis. However, in order to effect a significant improvement in crew training, a six-crew rotating shift basis is desired in order that additional crew time can be devoted strictly to training.

Currently, five-shift manning is as follows:

- Combined SS/STA - SRO license
- Unit Operator I - SRO license
- Unit Operator II - RO license
- Licensed Station Operator - RO license
- Station Operators - 3 (nonlicensed operators)
- Chem/HP Technician - 1 (nonlicensed) (available to all shifts)

The desired six-shift crew makeup effective late 1983 or early 1984 and on an interim basis until fully manned per reference (1) is:

- STA - degreed engineer qualified STA available to all shifts (available to all crews on or before January 1, 1984, whether or not six shifts are implemented)
- SS - SRO license
- Unit Operator I - SRO license
- Unit Operator II - RO license
- Licensed Station Operator - RO license (available to some but not all crews as additional licenses are obtained)
- Station Operators - 3 (nonlicensed)
- Chem/HP Technician - 1 (nonlicensed) (available to all shifts)

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The final long-term manning to meet reference (1) requirements would consist of the following crew makeup:

STA - degreed engineer qualified STA available to all shifts (on or before January 1, 1984)
SS - SRO license
Control Room Supervisor - SRO license
Unit Operator I - RO license
Unit Operator II - RO license
Licensed Station Operator - RO license; as additional licenses are obtained as a contingency for possible losses by attrition, one station operator position would be manned by a licensed station operator
Station Operators - 2-3 (nonlicensed) depending on status of the third station operator who may or may not be licensed (license desired as indicated above)
Chem/HP Technician - 1 (nonlicensed) (available to all shifts)

In support of the request for an extension in meeting all the shift manning requirements specified in reference (1), the following are presented for consideration:

1. Implementation of the manning levels required by reference (1) on January 1, 1984, would adversely affect the training program. While manning level requirements could be met on a five-shift rotation, it is essential that six shifts be implemented, as has long been planned, in order to effectively utilize the expanded CNS training effort aimed at improving plant safety. In addition, increased training has been shown to improve morale and ease the requalification burden for individuals. Dilution of the planned training effort could lead to reduced morale, more difficulty in maintaining requalification and loss of licensed operators to more lucrative positions in the industry. These losses would further delay implementation of the desired shift manning.
2. The District is firmly committed to hire and train the necessary number of operators to fully support six operating crews. In a recent reorganization of CNS, Operations Department manning was increased to fully man six crews plus provide an additional four operators above the minimum required for six-crew operations to allow for attrition. Currently 44 operators are assigned to the crews and recruiting is being aggressively pursued to complete the staffing.
3. As noted above, Cooper Nuclear Station Operations Department manning is sufficient for six crews now. Full six-shift implementation is prevented only by the long lead time needed to obtain the required RO/SRO licenses.
4. The District's goal is to reach 10 CFR 50.54 (m)(2)(i) manning in a six-shift rotation as soon as feasible. With satisfactory results of the license examinations taken in August, 1983, and planned RO and SRO examinations in March, 1984, this goal could be reached as

Mr. Domenic B. Vassallo

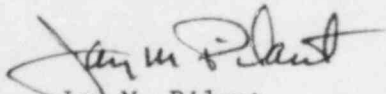
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early as May, 1984. To allow for a contingency should the examinations scheduled in March, 1984, not be fully successful, however, we have established a target date of November 1, 1984, to be in full compliance with the new rule.

In summary, Cooper Nuclear Station manning currently meets the requirements of 10 CFR 50.54 (m)(2)(ii), (iii), and (iv). The District is requesting an extension of time, to November 1, 1984, to meet the staffing specifications of 10 CFR 50.54 (m)(2)(i) for the reasons discussed above. The operators needed to fully comply with reference (1) are on board and are in various stages of training. The benefits of additional training and increased operator morale warrant six-crew manning with the assets available. In the interim, experienced well-trained operators are available to operate the plant in a safe and efficient manner.

Sincerely,



Jay M. Pilant
Technical Staff Manager
Nuclear Power Group

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