



Northern States Power Company

Prairie Island Nuclear Generating Plant

1717 Wakonade Dr. East
Welch, Minnesota 55089

November 13, 1996

10 CFR 55

U S Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

Response to Operations Staffing Issues Discussed in
Inspection Report No. 50-282/306/96008 (DRP)

NRC Inspection Report No. 50-282/306/96008 (DRP) of October 7, 1996, identified that working in the work control center had occasionally been used to credit operator as "actively performing the functions of an operator or senior operator" for the purposes of maintaining operator licenses in an active status. This practice has been discontinued.

The report also identified that the Shift Manager is credited with actively performing the functions of a senior operator even though neither Technical Specifications nor 10 CFR 50.54 requires the Shift Manager be licensed. The report did note that administrative procedures do require that the Shift Manager hold a senior operator license.

Revision 35 of Operations Section Work Instruction (SWI) O-2, Shift Organization, Operation & Turnover (attached) identifies the positions and responsibilities of the crew positions at Prairie Island. Four NRC licensed positions are delineated in the procedure. These positions and their license responsibilities are:

Shift Manager - There shall be one senior licensed Shift Manager on duty at all times. The Shift Manager is responsible for the direction and coordination of the activities of the Shift Supervisor and may direct the activities of licensed operators or manipulate the controls that directly affect reactivity or reactor power level.

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Shift Supervisor - There shall be one senior licensed Shift Supervisor on duty at all times for each reactor that contains fuel. The Shift Supervisor has the primary management responsibility for safe operation of the unit. The Shift Supervisor directs the activities of licensed operators and may manipulate the controls that directly affect reactivity or reactor power level.

Lead Plant Equipment and Reactor Operator - The Lead Plant Equipment and Reactor Operator (LPE & RO) is responsible for direct operation of the plant controls and equipment and for ensuring that routine plant operations and requirements of the assigned are carried out in a timely and efficient manner.

Plant Equipment and Reactor Operator - The Plant Equipment and Reactor Operator (PE & RO) is responsible for direct operation of the plant controls and equipment.

Shift Managers and Shift Supervisors are licensed at the senior operator level. LPE & ROs and PE & ROs are licensed at the operator level and may be licensed at the senior operator level.

A Technical Specification amendment has been submitted which requires the Shift Manager position be licensed at the senior operator level.

With these responsibilities, our interpretation of 10 CFR 55.53 and NUREG-1262 is that the Shift Manager, Shift Supervisor, Lead Plant Equipment and Reactor Operator, and Plant Equipment and Reactor Operator all maintain active operator or senior operator licenses. Please advise if this interpretation is incorrect.

In this letter we have made the following new Nuclear Regulatory Commission commitment:

Working in the work control center will no longer be used to credit operators as "actively performing the functions of an operator or senior operator" for the purposes of maintaining operator licenses in an active status.

USNRC
November 13, 1996
Page 3

NORTHERN STATES POWER COMPANY

Please contact Joel Sorensen (612-388-1121, Ext. 4567) if you have any questions related to this letter.

Jack Leville

for Michael D Wadley
Plant Manager
Prairie Island Nuclear Generating Plant

c: Regional Administrator -- Region III, NRC
Senior Resident Inspector, NRC
NRR Project Manager, NRC
J E Silberg
Melvin Leach, Director, Operator Licensing Branch -- Region III, NRC

Attachment: Prairie Island Section Work Instruction SWI O-2, Rev 35, Shift
Organization, Operation & Turnover