



A PECO Energy/British Energy Company

Ron J. DeGregorio
Vice President

AmerGen Energy Company, LLC
Oyster Creek
U.S. Route 9 South
P.O. Box 388
Forked River, NJ 08731-0388
Telephone: 609 971 2300

August 29, 2000
2130-00-20095

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

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Facility License No. DPR-16
Technical Specification Change Request No. 277
Change to Position Titles and to Allow a Dual-Role Shift Technical
Advisor (T.S. Section 6)

In accordance with 10 CFR 50.4(b)(1), enclosed is Oyster Creek Technical Specification Change Request (TSCR) No. 277. The purpose of this technical specification change is to (1) make administrative changes in the "Administrative Controls" section of the Technical Specifications to certain position titles and to (2) change the Shift Technical Advisor (STA) staffing requirement to allow one of the required on-shift Senior Reactor Operator (SRO) positions to be combined with the required STA position so as to serve in a dual-role SRO/STA position as encouraged by the NRC in Option 1 of Generic Letter 86-04, "Policy Statement on Engineering Expertise On Shift", dated February 13, 1986. This action requires changes to Technical Specification 6.1.1 (TS 6.1.1), TS 6.2.2.2(a), TS 6.2.2.2(h) and TS 6.2.2.2(j).

Using the standards in 10 CFR 50.92, AmerGen Energy has concluded that the proposed changes do not constitute a significant hazards consideration, as described in the enclosed analysis performed in accordance with 10 CFR 50.91(a)(1).

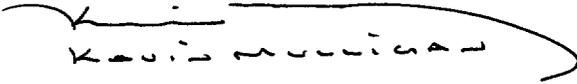
AmerGen Energy requests that this technical specification change be approved by March 1, 2001.

A 001

Also enclosed is a Certificate of Service for this request, certifying service to the chief executives of the township and county in which the facility is located, as well as the designated official of the state of New Jersey, Bureau of Nuclear Engineering.

If you have any questions or comments on this matter, please contact Paul Czaya, Oyster Creek Licensing at (609) 971-4139.

Very truly yours,


FOR Ron J. DeGregorio
Vice President
Oyster Creek

Enclosure

c: NRC Administrator, Region I
NRC Senior Project Manager
NRC Senior Resident Inspector

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF)
AMERGEN ENERGY COMPANY, LLC)

DOCKET NO. 50-219

CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 277 for the Oyster Creek Nuclear Generating Station Technical Specifications, filed with the U.S. Nuclear Regulatory Commission on August 29, 2000, has this day of August 29, 2000, been served on the Mayor of Lacey Township, Ocean County, New Jersey by deposit in the U.S. mail, addressed as follows:

The Honorable William J. Boehm
Mayor of Lacey Township
818 West Lacey Road
Forked River, NJ 08731

By: 
FOR Ron J. DeGregorio
Vice President
Oyster Creek

AmerGen

A PECO Energy/British Energy Company

Ron J. DeGregorio
Vice President

AmerGen Energy Company, LLC
Oyster Creek
U.S. Route 9 South
P.O. Box 388
Forked River, NJ 08731-0388
Telephone: 609 971 2300

August 29, 2000
2130-00-20095

Mr. Kent Tosch, Director
Bureau of Nuclear Engineering
Department of Environmental Protection
CN 415
Trenton, NJ 08628

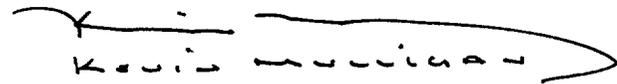
Dear Mr. Tosch:

Subject: Oyster Creek Nuclear Generating Station
Facility License No. DPR-16
Technical Specification Change Request No. 277

Enclosed is one copy of Technical Specification Change Request No. 277 for the Oyster Creek Nuclear Generating Station Operating License.

This document was filed with the U.S. Nuclear Regulatory Commission on August 29, 2000.

Very truly yours,



For
Ron J. DeGregorio
Vice President
Oyster Creek

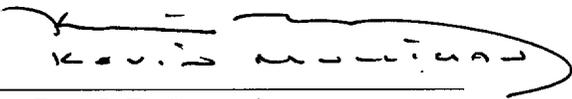
Enclosure

OYSTER CREEK NUCLEAR GENERATING STATION

OPERATING LICENSE
NO. DPR-16

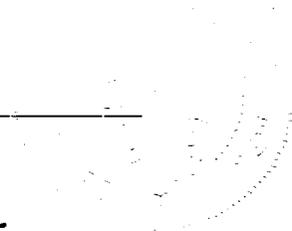
TECHNICAL SPECIFICATION
CHANGE REQUEST NO. 277
DOCKET NO. 50-219

Applicant submits by this Technical Specification Change Request No. 277 to the Oyster Creek Nuclear Generating Station Technical Specifications, modified pages 6-1, 6-2 and 6-2a.

By: 
For Ron J. DeGregorio
Vice President
Oyster Creek

Sworn to and Subscribed before me this 29th day of August, 2000


GEORGE W. BUSCH
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Aug. 8, 2005



I. TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NO. 277

AmerGen Energy Company, LLC requests that the following three (3) replacement pages be inserted into the existing Technical Specifications:

Replace existing pages 6-1, 6-2 and 6-2a with the attached revised replacement pages 6-1, 6-2 and 6-2a.

II. REASON FOR CHANGE

The reason for this technical specification change is to (1) make administrative changes in the "Administrative Controls" section of the Technical Specifications to certain position titles and to (2) change the Shift Technical Advisor (STA) staffing requirement to allow one of the required on-shift Senior Reactor Operator (SRO) positions to be combined with the required STA position so as to serve in a dual-role SRO/STA position as encouraged by the NRC in Option 1 of Generic Letter 86-04, "Policy Statement on Engineering Expertise On Shift", dated February 13, 1986. This action requires changes to Technical Specification 6.1.1 (TS 6.1.1), TS 6.2.2.2(a), TS 6.2.2.2(h) and TS 6.2.2.2(j).

As part of the change in position titles, the current position of "Director – Operations and Maintenance" is being eliminated and is being replaced by two positions, "Plant Manager" and "Director - Maintenance". The "Plant Manager" position will maintain all the operational responsibilities currently held by the "Director – Operations and Maintenance" while the position of "Director – Maintenance" will maintain all the maintenance responsibilities currently held by the "Director – Operations and Maintenance".

Specifically, in the Technical Specifications, the position title "Director – Operations and Maintenance" is being changed to "Plant Manager" in Specifications 6.1.1 (2 places), the position title "Group Shift Supervisor" is being changed to "Shift Manager" in Specification 6.2.2.2(a) (2 places) and in Specification 6.2.2.2(j), the position title "Control Room Operators" is being changed to "licensed Nuclear Plant Operators" in Specification 6.2.2.2(a) and 6.2.2.2(j), the positions titled "Three (3) equipment operators – one may be a Radwaste Operator" are being changed to "Three (3) licensed or non-licensed Nuclear Plant Operators" in Specification 6.2.2.2(a), and the position title "Plant Operations Director" is being changed to "Senior Manager – Operation" in Specification 6.2.2.2(j). These position title changes are administrative changes.

In addition, being added to the STA staffing requirement of Technical Specification (TS) 6.2.2.2(h) is the following sentence:

“... The Shift Technical Advisor position may be filled by an on-shift Senior Reactor Operator (dual-role SRO/STA) provided the individual meets the requirements of 6.3.3.”

Finally, in conjunction with the above STA staffing requirement change, being added to Specification 6.2.2.2(a), following the proposed wording of “Shift Manager” is a reference to Specification 6.2.2.2(h) stated as “(see h. below)”.

Oyster Creek TS 6.1.1 currently states:

“The Vice President - Oyster Creek shall be responsible for overall facility operation. Those responsibilities delegated to the Vice President as stated in the Oyster Creek Technical Specifications may also be fulfilled by the Director – Operations and Maintenance. The Vice President shall delegate in writing the succession to this responsibility during his and/or the Director – Operations and Maintenance absence.”

TSCR 277 proposes to change TS 6.1.1 to read as follows:

“The Vice President - Oyster Creek shall be responsible for overall facility operation. Those responsibilities delegated to the Vice President as stated in the Oyster Creek Technical Specifications may also be fulfilled by the *Plant Manager*. The Vice President shall delegate in writing the succession to this responsibility during his and/or the *Plant Manager* absence.”

Oyster Creek TS 6.2.2.2(a) currently states:

“Each on duty shift shall include at least the following shift staffing:

- One (1) group shift supervisor
- Two (2) control room operators
- Three (3) equipment operators – one may be a Radwaste Operator
- One (1) Shift Technical Advisor (see h. below)

Except for the group shift supervisor, shift crew composition may be one less than the minimum requirements, for a period of time not to exceed two hours, in order to accommodate unexpected absence of on-duty shift crew members. Immediate action must be taken to restore the shift crew composition to within requirements given above. This provision does not permit any shift crew position to be unmanned upon shift change due to an incoming shift crew member being late or absent.”

TSCR 277 proposes to change TS 6.2.2.2(a) to read as follows:

“Each on duty shift shall include at least the following shift staffing:

- One (1) *Shift Manager (see h. below)*
- Two (2) *licensed Nuclear Plant Operators*
- Three (3) *licensed or non-licensed Nuclear Plant Operators*
- One (1) Shift Technical Advisor (see h. below)

Except for the *Shift Manager*, shift crew composition may be one less than the minimum requirements, for a period of time not to exceed two hours, in order to accommodate unexpected absence of on-duty shift crew members. Immediate action must be taken to restore the shift crew composition to within requirements given above. This provision does not permit any shift crew position to be unmanned upon shift change due to an incoming shift crew member being late or absent.”

Oyster Creek TS 6.2.2.2(h) currently states:

“Each on duty shift shall include a Shift Technical Advisor except that the Shift Technical Advisors position need not be filled if the reactor is in the refuel or shutdown mode and the reactor is less than 212 F.”

TSCR 277 proposes to change TS 6.2.2.2(h) to read as follows:

“Each on duty shift shall include a Shift Technical Advisor except that the Shift Technical Advisors position need not be filled if the reactor is in the refuel or shutdown mode and the reactor is less than 212 F. *The Shift Technical Advisor position may be filled by an on-shift Senior Reactor Operator (dual-role SRO/STA) provided the individual meets the requirements of 6.3.3.*”

Oyster Creek TS 6.2.2.2(j) currently states:

“The Plant Operations Director and the Group Shift Supervisor require Senior Reactor Operator licenses. The Control Room Operators require a Reactor Operators license.”

TSCR 277 proposes to change TS 6.2.2.2(j) to read as follows:

“The *Senior Manager - Operations* and the *Shift Manager* require Senior Reactor Operator licenses. The *licensed Nuclear Plant Operators* require a Reactor Operators license.”

III. SAFETY EVALUATION JUSTIFYING CHANGE

USNRC Generic Letter 86-04, "Policy Statement on Engineering Expertise On Shift", dated February 13, 1986 (Enclosure - NRC "Policy Statement on Engineering Expertise on Shift", dated October 28, 1985), offers licensees two options for meeting the requirements for providing engineering expertise on shift (NUREG-0737, Item I.A.1.1) and meeting licensed operator staffing requirements (10 CFR 50.54 (m)(2)).

Option 1 provides for elimination of the separate STA position by allowing licensees to combine one of the required SRO positions with the STA position into a dual-role SRO/STA position.

Option 2 states that a licensee may continue to use a NRC-approved STA program while meeting licensed operator staffing requirements. Licensees may use either option on each shift.

The Commission encouraged licensees to move toward the dual-role SRO/STA position, with the eventual goal of the Shift Supervisor (Oyster Creek Group Operating Supervisor (GOS)) serving in the dual-role.

Oyster Creek currently uses Option 2. This TSCR will allow Oyster Creek to use either Option 1 or Option 2.

Review of implementation of Option 1 needs to address the (a) STA knowledge/experience requirement (TS 6.3.3), the (b) minimum duty shift staffing requirements (TS 6.2.2.2) and/or the (c) Oyster Creek Fire Protection Program (fire brigade) requirements.

When Option 1 is applied, the SRO assuming a dual-role as SRO/STA will be required to satisfy TS 6.3.3 STA knowledge/experience requirements as stated in the proposed TSCR wording for TS 6.2.2.2(h). Therefore TS 6.3.3 STA knowledge/experience requirements will be satisfied.

The dual-role SRO/STA position option recommended by the NRC "Policy Statement on Engineering Expertise on Shift", combines one of the required SRO positions and the STA position. Therefore, use of the dual-role SRO/STA position option will not result in the need to assign an additional SRO to meet minimum shift staffing requirements. The NRC Policy Statement specifically states that the number of shift personnel specified in 10CFR 50.54(m)(2) is sufficient to allow the individual filling the dual-role SRO/STA position to provide both accident assessment expertise, and to analyze and respond to off-normal occurrences when needed. The purpose of the STA position is to ensure that engineering and accident assessment expertise is available on each shift. The NRC Policy Statement concludes that the dual-role SRO/STA position can provide this expertise and simultaneously function as one of the SROs required to meet staffing levels in 10CFR50.54(m)(2) and Oyster Creek TS 6.2.2.2.

The minimum duty shift staffing is specified in TS 6.2.2.2(a). Under TS 6.2.2.2(a) staffing, only the position of group shift supervisor requires an SRO license and therefore would be the only person available to be the STA under minimum duty shift staffing should Option 1 (dual-role SRO/STA) be utilized. However, TS 6.2.2.2(c) and (h) place additional requirements on the staffing required. TS 6.2.2.2(c) requires a minimum of two SROs and two licensed reactor operators on site with one SRO in the control room and one licensed reactor operator at the controls except when in the Cold Shutdown or Refuel modes. TS 6.2.2.2(h) does not require a STA on duty when in the Cold Shutdown or Refuel modes. Hence, existing TS requirements ensure that whenever an STA position is required there will be a minimum of two SROs and two licensed reactor operators on duty. This staffing level is in compliance with 10 CFR Part 50.54(m)(2) for a one unit site and makes available two SROs should Option 1 (dual-role SRO/STA) be utilized. Therefore, the proposed TSCR allowing for a dual-role SRO/STA would not require any changes to existing duty staffing requirements and compliance with 10 CFR Part 50.54(m)(2) and the existing Oyster Creek Technical Specifications is maintained.

There are no TS requirements for the Oyster Creek fire brigade. Also, there are no existing requirements in the Oyster Creek Fire Protection Program for either an STA or a SRO to be part of the Oyster Creek fire brigade. Therefore, the proposed TSCR allowing for a dual-role SRO/STA would not require any changes to the existing Oyster Creek Fire Protection Program or fire brigade requirements.

In summary, implementation of the proposed dual-role SRO/STA change will result in personnel with enhanced operational knowledge being assigned to perform the STA function of providing accident assessment expertise, and analyzing and responding to off normal occurrences when needed. The NRC's stated preference in the October 28, 1985, "Policy Statement on Engineering Expertise on Shift", indicates that the NRC has concluded that the individual filling the dual-role SRO/STA position may perform these functions better than a non-licensed individual filling the STA position even when the SRO/STA is concurrently functioning as one of the required shift SROs.

As part of the change in position titles, the current position of "Director – Operations and Maintenance" is being eliminated and is being replaced by two positions, "Plant Manager" and "Director - Maintenance". The "Plant Manager" position will maintain all the operational responsibilities currently held by the "Director – Operations and Maintenance" while the position of "Director – Maintenance" will maintain all the maintenance responsibilities currently held by the "Director – Operations and Maintenance".

The changes in position titles of "Director – Operations and Maintenance" to "Plant Manager" in Specifications 6.1.1 (2 places), "Group Shift Supervisor" to "Shift Manager" in Specification 6.2.2.2(a) (2 places) and in Specification 6.2.2.2(j), "Control Room Operators" to "licensed Nuclear Plant Operators" in Specification 6.2.2.2(a) and 6.2.2.2(j), "Three (3) equipment operators – one may be a Radwaste Operator" to "Three

(3) licensed or non-licensed Nuclear Plant Operators” in Specification 6.2.2.2(a), and the position title “Plant Operations Director” to “Senior Manager – Operation” in Specification 6.2.2.2(j) will not effect safety since the titles themselves have no safety function and the technical requirements for the position responsibilities are not being changed. The reason for the title changes is that AmerGen has determined that these position titles should conform to those used at its other sites. Therefore, the change of these position titles is an administrative change in terminology used in the Technical Specifications and, as such, they will have no effect on safety.

Review of the Oyster Creek Emergency Plan determined that the staffing levels currently required by the Emergency Plan exceed the minimum staffing levels required by the current Technical Specifications and the proposed TSCR. The existing required Emergency Plan staffing levels will continue to be maintained after implementation of the proposed TSCR. Therefore, this TSCR will not affect or require changes to the current Oyster Creek Emergency Plan. Any future changes to the Emergency Plan will be performed in compliance with 10 CFR 50.54(q).

IV. NO SIGNIFICANT HAZARDS CONSIDERATION

AmerGen Energy Company, LLC has determined that this TSCR poses no significant hazard as defined by 10 CFR 50.92.

1. Would operation of the facility in accordance with the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

The purposed changes do not affect the purpose, function, performance, operability, inspection or testing of and does not make any physical or procedural changes to plant systems, structures or components. Also, all existing technical specification limiting conditions for operation and surveillance requirements are retained.

TSCR 277 makes administrative changes to certain position titles without changing the technical requirements for the position responsibilities.

TSCR 277 also changes the Shift Technical Advisor (STA) staffing requirement to allow one of the required on-shift Senior Reactor Operator (SRO) positions to be combined with the required STA position so as to serve in a dual-role SRO/STA position as encouraged by the NRC in Option 1 of Generic Letter 86-04, “Policy Statement on Engineering Expertise On Shift”, dated February 13, 1986.

Implementation of the proposed dual-role SRO/STA change will result in personnel with enhanced operational knowledge being assigned to

perform the STA function of providing accident assessment expertise, and analyzing and responding to off normal occurrences when needed. The NRC's stated preference in the October 28, 1985, "Policy Statement on Engineering Expertise on Shift", indicates that the NRC has concluded that the individual filling the dual-role SRO/STA position may perform these functions better than a non-licensed individual filling the STA position even when the SRO/STA is concurrently functioning as one of the required shift SROs.

Therefore, since no physical or procedural changes are being made to existing plant systems, structures or components and since the position title changes are administrative in nature and the function and responsibilities of the STA will be executed by an appropriately qualified individual filling the dual-role SRO/STA position, operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Would operation of the facility in accordance with the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes do not affect the purpose, function, performance, operability, inspection or testing of and does not make any physical or procedural changes to plant systems, structures or components. Also, all existing technical specification limiting conditions for operation and surveillance requirements are retained.

TSCR 277 makes administrative changes to certain position titles without changing the technical requirements for the position responsibilities.

TSCR 277 also changes the Shift Technical Advisor (STA) staffing requirement to allow one of the required on-shift Senior Reactor Operator (SRO) positions to be combined with the required STA position so as to serve in a dual-role SRO/STA position as encouraged by the NRC in Option 1 of Generic Letter 86-04, "Policy Statement on Engineering Expertise On Shift", dated February 13, 1986.

Therefore, since no physical or procedural changes are being made to existing plant systems, structures or components and since the position title changes are administrative in nature and the function and responsibilities of the STA will be executed by an appropriately qualified individual filling the dual-role SRO/STA position, operation of the facility in accordance with the proposed amendment would not create the

possibility of a new or different kind of accident from any accident previously evaluated.

3. Would operation of the facility in accordance with the proposed change involve a significant reduction in a margin of safety?

The purposed changes do not affect the purpose, function, performance, operability, inspection or testing of and does not make any physical or procedural changes to plant systems, structures or components. Also, all existing technical specification limiting conditions for operation and surveillance requirements are retained.

TSCR 277 makes administrative changes to certain position titles without changing the technical requirements for the position responsibilities.

TSCR 277 also changes the Shift Technical Advisor (STA) staffing requirement to allow one of the required on-shift Senior Reactor Operator (SRO) positions to be combined with the required STA position so as to serve in a dual-role SRO/STA position as encouraged by the NRC in Option 1 of Generic Letter 86-04, "Policy Statement on Engineering Expertise On Shift", dated February 13, 1986.

Therefore, since no physical or procedural changes are being made to existing plant systems, structures or components and since the position title changes are administrative in nature and the function and responsibilities of the STA will be executed by an appropriately qualified individual filling the dual-role SRO/STA position and shift staffing required by TS 6.2.2.2 and 10CFR50.54(m)(2) will continued to be maintained, operation of the facility in accordance with the proposed amendment will not involve a significant reduction in margin of safety.

V. IMPLEMENTATION

AmerGen Energy Company, LLC requests that the amendment authorizing this change be effective upon issuance.

ATTACHMENT 1

REVISED TECHNICAL SPECIFICATION PAGES: 6-1, 6-2 and 6-2a

Note: Pagination causes a portion of TS 6.2.2.2(a) and TS 6.2.2.2(b) on page 6-1 to carry over to page 6-2 and TS 6.2.2.2(i)(c), TS 6.2.2.2(i)(d) and TS 6.2.2.2(i)(e) on page 6-2 to carry over to page 6.2-a.

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Vice President - Oyster Creek shall be responsible for overall facility operation. Those responsibilities delegated to the Vice President as stated in the Oyster Creek Technical Specifications may also be fulfilled by the Plant Manager. The Vice President shall delegate in writing the succession to this responsibility during his and/or the Plant Manager absence.

6.2 ORGANIZATION

6.2.1 Corporate

6.2.1.1 An onsite and offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

6.2.1.2 Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including operating organization positions. These relationships shall be documented and updated as appropriate, in the form of organizational charts. These organizational charts will be documented in the Updated FSAR and updated in accordance with 10 CFR 50.71e.

6.2.1.3 The Chief Nuclear Officer shall have corporate responsibility for overall plant nuclear safety and shall take measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.

6.2.2 FACILITY STAFF

6.2.2.1 The Vice President - Oyster Creek shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

6.2.2.2 The facility organization shall meet the following:

- a. Each on duty shift shall include at least the following shift staffing:
 - One (1) Shift Manager (see h. below)
 - Two (2) licensed Nuclear Plant Operators
 - Three (3) licensed or non-licensed Nuclear Plant Operators
 - One (1) Shift Technical Adviser (see h. below)

Except for the Shift Manager, shift crew composition may be one less than the minimum requirements, for a period of time not to exceed two hours, in order to accommodate unexpected absence of on-duty shift crew members. Immediate action must be taken to restore the shift crew

composition to within requirements given above. This provision does not permit any shift crew position to be unmanned upon shift change due to an incoming shift crew member being late or absent.

- b. At all times when there is fuel in the vessel, at least one licensed senior reactor operator shall be on site and one licensed reactor operator should be at the controls.
- c. At all times when there is fuel in the vessel, except when the reactor is in COLD SHUTDOWN or REFUEL modes, two licensed senior reactor operators and two licensed reactor operators shall be on site, with at least one licensed senior reactor operator in the control room and one licensed reactor operator at the controls.
- d. At least two licensed reactor operators shall be in the control room during all reactor startups, shutdowns, and other periods involving planned control rod manipulations.
- e. All CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. An individual qualified in radiation protection measures shall be on site when fuel is in the reactor.
- g. (deleted)
- h. Each on duty shift shall include a Shift Technical Advisor except that the Shift Technical Advisors position need not be filled if the reactor is in the refuel or shutdown mode and the reactor is less than 212 F. The Shift Technical Advisor position may be filled by an on-shift Senior Reactor Operator (dual-role SRO/STA) provided the individual meets the requirements of 6.3.3.
- i. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions.

In the event that unforeseen problems require substantial amounts of overtime to be used or during extended periods of shutdown for refueling, major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:

- a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- b. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven-day period, all excluding shift turnover time.

- c. A break of at least eight hours should be allowed between work period, including shift turnover time.
- d. In a, b, and c above, the time required to complete shift turnover is to be counted as break time and is not to be counted as work time.
- e. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Department Managers, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

- j. The Senior Manager - Operations and the Shift Manager require Senior Reactor Operators licenses. The licensed Nuclear Plant Operators require a Reactor Operators license.

6.2.2.3 Individuals who train the operating staff and those who carry out the health physics and quality assurance function shall have sufficient organizational freedom to be independent of operational pressures, however, they may report to the appropriate manager on site.

6.3 Facility Staff Qualifications

- 6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1 of 1978 for comparable positions unless otherwise noted in the Technical Specifications. Licensed operators shall meet the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees. Technicians and maintenance personnel who do not meet ANSI/ANS 3.1 of 1978, Section 4.5, are permitted to perform work for which qualification has been demonstrated.
- 6.3.2 The management position responsible for radiological controls shall meet or exceed the qualifications of Regulatory Guide 1.8 (Rev. 1-R, 9/75). Each other member of the radiation protection organization for which there is a comparable position described in ANSI N18.1-1971 shall meet or exceed the minimum qualifications specified therein, or in the case of radiation protection technicians, they shall have at least one year's continuous experience in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power stations and shall have been certified by the management position responsible for radiological controls as qualified to perform assigned functions. This certification must be based on an NRC approved, documented program consisting of classroom training with appropriate examinations and documented positive findings by responsible supervision that the individual has demonstrated his ability to perform each specified procedure and assigned function with an understanding of its basis and purpose.
- 6.3.3 The Shift Technical Advisors shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, response and analysis of the plant for transients and accidents.