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United States Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop O-P1-17
Washington, D.C. 20555

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333

Use of the Dual Role SRO/STA Function at the James A. FitzPatrick Nuclear Power Plant (JAFNPP)

Reference: 1. New York Power Authority letter JPN-92-001, J. C. Brons to J. M. Taylor, dated January 3, 1992, providing response to the NRC's Diagnostic Evaluation Team Report on the FitzPatrick Nuclear Power Plant

Dear Sir:

This letter confirms previous discussions that, commencing in January, 2001, the JAFNPP will re-institute the dual role SRO/STA function described in JAF Technical Specifications and the JAF FSAR.

JAF Technical Specifications, section 6.3.2 states:

> The Shift Technical Advisor (STA) shall meet or exceed the minimum requirements of either Option 1 (Combined SRO/STA Position) or Option 2 (Continued use of STA Position), as defined in the Commission Policy Statement on Engineering Expertise on Shift, published in the October 28, 1985 Federal Register (50 FR 43621). When invoking Option 1, the STA role may be filled by the Shift Manager or Control Room Supervisor.

Similarly, the JAF FSAR Section 13.2.2.2 includes a footnote under the discussion of STA qualifications and responsibilities that states:

> The Shift Technical Advisor position may be a dual role (SRO/STA) who also is performing the duties of Shift Manager or Control Room Supervisor.

In January, 1992, in response to deficiencies in control room staffing noted during that time frame, the JAFNPP stated an intent to "... re-institute the Shift Technical Advisor (STA) as a separate position apart from the combined STA/Assistant Shift Supervisor..." (Reference 1). Although the dual role SRO/STA option was retained in the FSAR and Technical Specifications, this option has not been exercised since implementation of this intent.

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The purpose of return to use of the dual role SRO/STA function is to provide greater flexibility in shift staffing. The change will not diminish shift capabilities or affect required staffing levels. Administrative controls will be established such that only the Shift Manager may serve in the dual role SRO/STA function. Both the Shift Manager and STA serve similar oversight roles during off-normal situations. Limiting the dual role SRO/STA function to the Shift Manager position assures required on shift engineering expertise is retained consistent with the independent oversight role.

In summary, exercise of the dual role SRO/STA function is consistent with JAF Technical Specifications and the FSAR, and provides crew staffing flexibility without diminishing shift capabilities or expertise.

Please contact Messrs. John Hoddy (315-349-6538) or Phil Russell (315-349-6301) with any questions.

Very truly yours,

Michael J. Colomb
Site Executive Officer

MJC:JH:las

Cc: USNRC Regional Administrator
USNRC Project Directorate
USNRC Resident Inspector