

June 9, 2005

Dr. Graham B. Wallis, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: GUIDANCE FOR ASSESSING EXEMPTION REQUESTS FROM NUCLEAR
POWER PLANT LICENSED OPERATOR STAFFING REQUIREMENTS

Dear Dr. Wallis:

I am responding to your letter of May 13, 2005, regarding the proposed revision to NUREG-0800, "Standard Review Plan" (SRP), Chapter 13.0, "Conduct of Operations," Section 13.1.2 - 13.1.3, "Operating Organization," and the supporting document, NUREG-1791, "Guidance for Assessing Exemption Requests From the Nuclear Power Plant Licensed Operating Staffing Requirements Specified in 10 CFR 50.54(m)." The staff agrees with your conclusions and recommendations.

As recommended in your letter, the staff has revised Sections 10.1.3.2 and 10.3.3 of NUREG-1791, to emphasize the importance of objective measures to evaluate the safety implications of staffing schemes. NUREG-1791 was also revised to include objective criteria for using simulation data in the evaluation. NUREG/CR-6838, "Technical Basis for Regulatory Guidance for Assessing Exemption Requests from the Nuclear Power Plant Licensed Operating Staffing Requirements Specified in 10 CFR 50.54(m)," is now cited in NUREG-1791.

The staff will issue NUREG-0800, "Standard Review Plan" (SRP), Chapter 13.0, "Conduct of Operations," Section 13.1.2 - 13.1.3 "Operating Organization," Revision 5, and the revised supporting document, NUREG-1791.

Thank you for the insightful questions and feedback on the guidance documents.

Sincerely,

/William F. Kane for/

Luis A. Reyes
Executive Director
for Operations

cc: Chairman Diaz
Commissioner McGaffigan
Commissioner Merrifield
Commissioner Jazcko
Commissioner Lyons
SECY

June 9, 2005

Dr. Graham B. Wallis, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: GUIDANCE FOR ASSESSING EXEMPTION REQUESTS FROM NUCLEAR
POWER PLANT LICENSED OPERATOR STAFFING REQUIREMENTS

Dear Dr. Wallis:

I am responding to your letter of May 13, 2005, regarding the proposed revision to NUREG-0800, "Standard Review Plan" (SRP), Chapter 13.0, "Conduct of Operations," Section 13.1.2 - 13.1.3, "Operating Organization," and the supporting document, NUREG-1791, "Guidance for Assessing Exemption Requests From the Nuclear Power Plant Licensed Operating Staffing Requirements Specified in 10 CFR 50.54(m)." The staff agrees with your conclusions and recommendations.

As recommended in your letter, the staff has revised Sections 10.1.3.2 and 10.3.3 of NUREG-1791, to emphasize the importance of objective measures to evaluate the safety implications of staffing schemes. NUREG-1791 was also revised to include objective criteria for using simulation data in the evaluation. NUREG/CR-6838, "Technical Basis for Regulatory Guidance for Assessing Exemption Requests from the Nuclear Power Plant Licensed Operating Staffing Requirements Specified in 10 CFR 50.54(m)," is now cited in NUREG-1791.

The staff will issue NUREG-0800, "Standard Review Plan" (SRP), Chapter 13.0, "Conduct of Operations," Section 13.1.2 - 13.1.3 "Operating Organization," Revision 5, and the revised supporting document, NUREG-1791.

Thank you for the insightful questions and feedback on the guidance documents.

Sincerely,

/William F. Kane for/
Luis A. Reyes
Executive Director
for Operations

cc: Chairman Diaz
Commissioner McGaffigan
Commissioner Merrifield
Commissioner Jazcko
Commissioner Lyons
SECY

DISTRIBUTION: G20050368

RidsEdoMailCenter
RidsOgcMailCenter
RidsOPAMailCenter
DLew, RES
CPaperiello, RES
JDixon-Herrity, EDO

RidsNrrOd
RidsNrrDipm
RidsOcaMailCenter
ASzabo, RES
JPersensky, RES
AcrcAcnwMailCenter

RidsNrrAdpt
RidsNrrDipmlrob
RisNrrWpcMail
KCyr/SBurns, OGC
SLee, EDO

ADAMS: ML051470010-package, ML051440432-incoming, ML051530126-letter

OFFICE	IROB/DIPM	TechEditor	IROB/DIPM	IROB/DIPM	DIPM/NRR
NAME	JBongarra	PKleene	DTrimble	PHiland	BBoger
DATE	5/27/05	5/25/05	5/31/05	06/1/05	6/3/05
OFFICE	OD:NRR	EDO			
NAME	JEDyer	LReyes / WFKane for			
DATE	6/6/05	06/09/05			

OFFICIAL RECORD COPY