

From: Anne Passarelli *RI*
To: R1Allegation
Date: 6/4/04 1:17PM
Subject: Please replace old 2004-0070 with this new referral enclosure
Place: R1Allegation

Thanks!

CC: Daniel Holody; Scott Barber

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Enclosure 1

As PSEG is aware, the Utilities Service Alliance (USA) report, provided to the NRC with the PSEG May 21, 2004 letter, indicates that current management controls do not adequately capture and monitor actual levels of overtime worked by key plant personnel. The report specifies that:

- Interviews indicated that some personnel, including licensed operators, are working significant amounts of professional (unpaid) overtime in addition to those hours that are paid to keep up with their assigned duties. In many cases, these additional hours are not captured on official time sheets.
- Overtime reports that are reviewed by the plant managers do not provide sufficient detail to include information down to the individual usage levels. (These monthly reviews are required by Tech Specs.) Feedback indicated that the plant managers review/approve deviations from overtime limits rather than reviewing individual level monthly reports.

Regarding this USA finding, the following concern was raised:

Statement of Concern:

By not recording all hours on time sheets, undocumented overtime could potentially lead to nonconformance with PSEG procedures on control of overtime, including whether licensed operators are putting in longer hours than permitted by the working hour limits. If the undocumented overtime was excessive, it could also lead to violations of NRC requirements on the control of overtime.