From: Anne Passarelli LF
To: R1Allegation
Date: 6/4/04 11:47AM
Subject: enclosure for referral to PSEG (2004-0070)
Place: R1Allegation

see attached.

CC: Daniel Holody; Scott Barber

F-418

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:

Undocumented overtime could potentially lead to nonconformance with PSEG procedures on control of overtime. If the overtime abuse was excessive, it could also lead to violations of NRC requirements on the control of overtime.