

ATTACHMENT 1

ACCEPTABILITY REVIEW OF LICENSEE SHIFT STAFFING/AUGMENTATION TIME CHANGE REQUESTS (pg 1 of 2)

Site: <u>Pilgrum</u>	Date received by EPD: <u>1/20/06</u>
Technical reviewer: <u>Don A. Johnson</u>	Date acceptability review completed: <u>1/25/06</u>
Change request acceptable? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

<1> Review the documentation provided by the licensee and ascertain the acceptability of the submittal package by determining if the following elements are addressed in the submittal package. Note that some of these attributes may not be applicable to the specific area being evaluated.

APPLICATION CONTENT		YES	NO	N/A
COVER LETTER	Did the licensee specifically state what change(s) the licensee has requested review and approval for?		✓	
	Did the licensee state why the change(s) are being requested?		✓	
	Did the licensee identify which regulation or NRC guidance document under which the application is being submitted, i.e., acceptability determination of an alternate method of compliance (RG 1.101) or review of a decrease in effectiveness of the emergency plan (10 CFR 50.54(q)?		✓	
	Did the licensee provide the names of the licensing and technical contacts?	✓		
	Did the licensee request a specific date for NRC approval? If less than one year, did the licensee provide an acceptable reason? Can EPD support this date request?	✓		
	Did the licensee reference all attachments?	✓		
SUBMITTAL BODY	Did the licensee state each proposed change and discuss the justification for the change and any measures that will be implemented?	✓		
	Did the licensee state the new basis for the change and how it is as effective as or more effective than the current basis for the change?	✓		
	Did the licensee define any terms that are unique to the site, related to new technology, etc.?			✓
	Did the licensee provide a table showing the current NRR approved shift staffing/augmentation procedure, the proposed shift staffing/augmentation procedure, and the basis for the change(s)?	✓		
	Did the licensee provide an acceptable level of detail to support a technical review of the proposed change(s)?		✓	
	Did the licensee discuss the use of any precedents and a justification for why these stated precedents are applicable to this submittal?	✓		
	Did the licensee validate these proposed change(s) via drills, table-tops, or walkthroughs?		✓	
	Did the licensee change their augmentation process in such a way to compromise notifications (state, local, federal), ERO staffing, or ERO activation? Did the licensee provide an acceptable level of detail in support of these changes?			✓
	Did the licensee clearly define when the augmentation clock starts?			✓
	Did the licensee provide sufficiently detailed justification for changing the response time for each position/function being changed?			✓
Did the licensee provide sufficiently detailed justification for adding duties to existing positions and did this detail evaluate the impact these additional duties have on this position's performance?		✓		

3/14/06 1000 call

FRANK

ED

Ron (?)

EPD

Jim (PM)

Don

NRC

E-6

ATTACHMENT 1

ACCEPTABILITY REVIEW OF LICENSEE SHIFT STAFFING/AUGMENTATION TIME CHANGE REQUESTS (pg 2 of 2)

Comments:

- ① Licensee STATED they had already performed a 50.54(g) review & found no DIC. Therefore, no review required. However, this is a reduction in overall shift staffing levels & needs to be reviewed by NRC HQ.
- ② The licensee wants to go from 2 on shift RP Tech's down to 1 on shift RP Tech. This needs prior approval.
- ③ The licensee also wants to change the title of their RAD Chem Tech to RP/RAD Chem Tech. Would need to see qualifications impacted.
- ④ The licensee wants to revise one of the notes on their Table B-1 to match the notes in Nureg 0654 Table B-1. No big issue here.

Recommend rejection based upon:

- ① Did not follow "Smear Application Template" (ML 0425300110)
- ② Basically asking us to review their 50.54(g) evaluation. This is done by Region during baseline inspections.
- ③ Content of submitted lacking details (again, follow template & ASK FOR PRIOR APPROVAL under 50.54(g))
- ④ Give PM (Shea) a "heads-up" pending management approval (1/25/06)

ATTACHMENT 2 (page 1 of 2)
COMPARISON TABLES FOR SHIFT STAFFING ANALYSIS
(NUREG-0654 vs Current NRR Approved Plan)

Site: Pilgrim

Staffing levels (per reactor for Plant Ops, per site for all others)

Major Tasks	Position	On-Shift*		30-Min		60-Min	
		0654	Licensee	0654	Licensee	0654	Licensee
Plant Ops	Shift Supv (SRO)	1	1	--		--	
	Shift Foreman (SRO)	1	1	--		--	
	CR Operators	2	2	--		--	
	Aux Operators	2	2	--		--	
	Other _____						
Emergency Direction***	STA, SS or designated mgr.	1**	1 (STA)	--		--	
	Other _____						
Notification / Communication****	Communicators	1	1 (STA)	1	1	2	2
	Other _____						
Rad Assessment & Ops Assessment Support	EOF Director	--		--		1	1
	Sr. HP Dose Assessor	--		1	1	--	
	Other _____						
Offsite Surveys	HP Techs	--		2	2	2	2
Onsite (outside) Surveys	Other _____	--		1	1	1	1
Inplant Surveys		1	2	1	1	1	1
Chemistry / Radiochemistry	Chem Techs	1	1	--		1	1
	Other _____						
Technical Support	STA	1	1	--		--	
	Core/Thermal Hydraulics Eng	--		1	1	--	
	Electrical Engineer	--		--		1	1
	Mechanical Engineer	--		--		1	1
	Other _____						
Repair & Corrective Actions	Mechanics	1**	1 (RO)	--		1	1
	Rad Waste Operators	--		--		1	1 (RO)
	Electricians	1**	1 (RO)	1	2	1	1
	I&C Techs	--		1	1	--	
	Other _____						
Radiation Protection (access control, HP coverage, personnel monitoring, dosimetry issuance)	HP Techs	2**	2	2	2	2	2
	Other _____						
Firefighting	Fire Brigade Members	Tech Spec		N/A		N/A	
	Other _____						
First Aid	First Aid Qualified Personnel	2**		N/A		N/A	
	Other _____						
Security & Personnel Accountability	Security Personnel	Security Plan		N/A		N/A	
	Other _____						
Totals (check for double counting)		10		11		15	

Notes:

- * For each unaffected nuclear unit in operation, maintain at least one shift foreman, one control room operator and one auxiliary operator except that units sharing a control room may share a shift foreman if all functions are covered.
- ** May be provided by shift personnel assigned other functions.
- *** Overall direction of facility response to be assumed by EOF director when all centers are fully staffed. Director of minute to minute facility operations remains with senior manager in TSC or control room.
- **** May be performed by engineering aide to shift supervisor.

ATTACHMENT 2 (page 2 of 2)
COMPARISON TABLES FOR SHIFT STAFFING ANALYSIS
(Current NRR Approved Plan vs Proposed Plan)

Site: Pilgrim

Staffing levels (per reactor for Plant Ops, per site for all others)

Major Tasks	Position	On-Shift*		30-Min		60-Min	
		Current	Proposed	Current	Proposed	Current	Proposed
Plant Ops	Shift Supv (SRO)						
	Shift Foreman (SRO)						
	CR Operators						
	Aux Operators						
	Other _____						
Emergency Direction***	STA, SS or designated mgr.						
	Other _____						
Notification / Communication ****	Communicators						
	Other _____						
Rad Assessment & Ops Assessment Support	EOF Director						
	Sr. HP Dose Assessor						
	Other _____						
Offsite Surveys	HP Techs						
Onsite (outside) Surveys	Other _____						
Inplant Surveys		2	1				
Chemistry / Radiochemistry	Chem Techs <i>(5 TO 20 (Rad chem Techs))</i>	1	1				
	Other _____						
Technical Support	STA						
	Core/Thermal Hydraulics Eng						
	Electrical Engineer						
	Mechanical Engineer						
	Other _____						
Repair & Corrective Actions	Mechanics						
	Rad Waste Operators						
	Electricians						
	I&C Techs						
	Other _____						
Radiation Protection (access control, HP coverage, personnel monitoring, dosimetry issuance)	HP Techs						
	Other _____						
Firefighting	Fire Brigade Members						
	Other _____						
First Aid	First Aid Qualified Personnel						
	Other _____						
Security & Personnel Accountability	Security Personnel						
	Other _____						
Totals (check for double counting)							

Notes:

- * For each unaffected nuclear unit in operation, maintain at least one shift foreman, one control room operator and one auxiliary operator except that units sharing a control room may share a shift foreman if all functions are covered.
- ** May be provided by shift personnel assigned other functions.
- *** Overall direction of facility response to be assumed by EOF director when all centers are fully staffed. Director of minute to minute facility operations remains with senior manager in TSC or control room.
- **** May be performed by engineering aide to shift supervisor.