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SOUTHERN COMPANY
Energy to Serve Your World℠

June 12, 2008

NL-08-0832

Docket Nos.: 50-321 50-348 50-424
50-366 50-364 50-425

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

Joseph M. Farley Nuclear Plant
Edwin I. Hatch Nuclear Plant
Vogtle Electric Generating Plant
Revision to License Amendment Request to
Technical Specification 5.2, "Organization," and
License Amendment Request to TS 5.3, "Unit Staff Qualifications"

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) is submitting a request for an amendment to the Technical Specifications (TS) for Joseph M. Farley Nuclear Plant (FNP) Units 1 and 2, Edwin I. Hatch Nuclear Plant (HNP) Units 1 and 2, and Vogtle Electric Generating Plant (VEGP) Units 1 and 2. By telephone conference, NRC and SNC personnel discussed the wording of the Improved Standard Technical Specification in the context of SNC's July 17, 2007 amendment request. This request is submitted as a revision to the previous request for amendment to TS 5.2, dated July 17, 2007 and replaces that submittal in its entirety.

The proposed change will revise the current FNP, HNP, and VEGP TS 5.2.2.f requirements to be consistent among all three plants. The proposed change is consistent with the intent of the Improved Standard Technical Specifications and will require either the Operations Manager or at least one Operations Superintendent to hold an SRO license. This change will also provide conforming changes in the current FNP, HNP, and VEGP TS 5.3.

Enclosure 1 provides the basis for the proposed change. Enclosure 2 contains the TS markup pages. Enclosure 3 contains the TS clean typed pages.

SNC requests approval of the proposed license amendments by August 31, 2008. The proposed changes would be implemented within 30 days of issuance of the amendments for each plant.

(Affirmation and signature are provided on the following page.)

Mr. L. M. Stinson states he is a Vice President of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of his knowledge and belief, the facts set forth in this letter are true.

This letter contains no NRC commitments. If you have any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

L. M. Stinson
Vice President Fleet Operations Support

Sworn to and subscribed before me this 12th *day of* June, *2008.*

Notary Public

My commission expires: July 5, 2010

LMS/MNW/daj

Enclosures:
1. Basis for Proposed Change
2. Technical Specifications Markup Pages
3. Technical Specifications Clean Typed Pages

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. J. R. Johnson, Vice President – Farley
Mr. D. R. Madison, Vice President – Hatch
Mr. T. E. Tynan, Vice President – Vogtle
Mr. D. H. Jones, Vice President – Engineering
RType: CFA04.054; CHA02.004; CVC7000; LC# 14781

U. S. Nuclear Regulatory Commission
Mr. L. A. Reyes, Regional Administrator
Mr. R. A. Jervey, NRR Project Manager – Farley
Mr. R. E. Martin, NRR Project Manager – Hatch
Mr. R. A. Jervey, NRR Project Manager – Vogtle
Mr. E. L. Crowe, Senior Resident Inspector – Farley
Mr. J. A. Hickey, Senior Resident Inspector – Hatch
Mr. G. J. McCoy, Senior Resident Inspector – Vogtle

Alabama Department of Public Health
Dr. D. E. Williamson, State Health Officer

State of Georgia
Mr. N. Holcomb, Commissioner – Department of Natural Resources

Joseph M. Farley Nuclear Plant
Edwin I. Hatch Nuclear Plant
Vogtle Electric Generating Plant
Revision to License Amendment Request to
Technical Specification 5.2, "Organization," and
License Amendment Request to TS 5.3, "Unit Staff Qualifications"

Enclosure 1

Basis for Proposed Change

Joseph M. Farley Nuclear Plant
Edwin I. Hatch Nuclear Plant
Vogtle Electric Generating Plant
Revision to License Amendment Request to
Technical Specification 5.2, "Organization," and
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Enclosure 1

Basis for Proposed Change

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Enclosure 1

Basis for Proposed Change

1.0 Summary Description

This evaluation supports a request to revise Operating License (OL) NPF-2 and NPF-8 for Joseph M. Farley Nuclear Plant (FNP), Units 1 & 2; OL DPR-57 and NPF-5 for Edwin I. Hatch Nuclear Plant (HNP), Units 1 & 2; and OL NPF-68 and NPF-81 for Vogtle Electric Generating Plant (VEGP), Units 1 & 2.

Title 10 of the Code of Federal Regulations (CFR), Section 50.54(l), requires the licensee to "designate individuals to be responsible for directing the licensed activities of licensed operators. These individuals shall be licensed as senior operators...." The revision to the FNP, HNP, and VEGP OLs will change the FNP, HNP, and VEGP Technical Specifications (TS) paragraph 5.2.2.f regarding the requirements for the Operations Manager and will add a clarification statement to TS paragraph 5.3.1.

Under the proposed change, either the Operations Manager or at least one Operations Superintendent will be required to hold an SRO license. Therefore, in the event the Operations Manager does not hold an SRO license, an Operations Superintendent must hold an SRO license. In addition, in order to meet the requirements of 10 CFR 50.54(l), this individual will have the same management authority over the licensed operators as the Operations Manager and will be qualified at FNP and HNP to ANSI N18.1 – 1971, as required by TS paragraph 5.3.1 and at VEGP to Regulatory Guide 1.8, Revision 2, which invokes ANSI/ANS 3.1 – 1981, as required by TS paragraph 5.3.1. To eliminate inconsistency between TS 5.2.2.f and TS 5.3.1, a clarification regarding the qualifications of the Operations Manager was added to TS 5.3.1 for FNP, HNP, and VEGP. This clarification states that TS 5.2.2.f specifies the requirements for the Operations Manager regarding the holding of an SRO license. The proposed change is consistent with the intent of the Improved Standard Technical Specifications.

2.0 Detailed Description

<u>FNP Proposed TS Changes</u>

TS paragraph 5.2.2.f. Change "The Plant Manager or the Operations Manager shall hold an SRO license." to "The Operations Manager or at least one Operations Superintendent shall hold an SRO license."

TS paragraph 5.3.1. Add the following sentence at the end of the paragraph, "The Operations Manager shall meet or exceed the above requirements except that Technical Specification 5.2.2.f shall specify the requirements regarding the holding of an SRO license."

<u>HNP Unit 1 Proposed TS Changes</u>

TS paragraph 5.2.2.f. Change "The Operations Manager shall hold an active or inactive SRO license." to "The Operations Manager or at

least one Operations Superintendent shall hold an SRO license."

TS paragraph 5.3.1. Add the following sentence after the first sentence of the paragraph, "The Operations Manager shall meet or exceed the above requirements except that Technical Specification 5.2.2.f shall specify the requirements regarding the holding of an SRO license."

HNP Unit 2 Proposed TS Changes

TS paragraph 5.2.2.f. Change "The Operations Manager shall hold an active or inactive SRO license." to "The Operations Manager or at least one Operations Superintendent shall hold an SRO license."

TS paragraph 5.3.1. Add the following sentence after the first sentence of the paragraph, "The Operations Manager shall meet or exceed the above requirements except that Technical Specification 5.2.2.f shall specify the requirements regarding the holding of an SRO license."

VEGP Proposed TS Changes

TS paragraph 5.2.2.f. Change "The Operations Manager shall hold an SRO license." to "The Operations Manager or at least one Operations Superintendent shall hold an SRO license."

TS paragraph 5.3.1. Add the following sentence at the end of the paragraph, "The Operations Manager shall meet or exceed the above requirements except that Technical Specification 5.2.2.f shall specify the requirements regarding the holding of an SRO license."

3.0 Technical Evaluation

Each of the current FNP, HNP, and VEGP management structures are comprised of the Operations Manager and three (3) Operations Superintendents. In order to comply with the requirements of the proposed change to TS 5.2, either the Operations Manager or at least one Operations Superintendent will be required to hold an SRO license. Therefore, in the event the Operations Manager does not hold an SRO license, an Operations Superintendent must hold an SRO license. In addition, in order to meet the requirements of 10 CFR 50.54(l), this individual will have the same management authority over the licensed operators as the Operations Manager, and will be qualified to the following:

- At HNP, to ANSI N18.1 – 1971, as required by HNP Units 1 and 2 TS paragraphs 5.3.1;
- at FNP, to ANSI N18.1 – 1971, as required by FNP TS paragraph 5.3.1;
- and at VEGP, to Regulatory Guide 1.8, Revision 2 which invokes ANSI/ANS 3.1 – 1981, as required by VEGP TS paragraph 5.3.1.

These changes are consistent with the intent of the Improved Standard Technical Specifications, NUREG-1431, paragraph 5.2.2e (FNP and VEGP) and NUREG-1433, paragraph 5.2.2e (HNP).

4.0 Regulatory Evaluation

4.1 Significant Hazards Consideration

Southern Nuclear Operating Company (SNC) has evaluated whether or not a significant hazards consideration is involved with the proposed changes by focusing on the three standards set forth in 10 CFR 50.92(c) as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change to TS 5.2 revises the requirement concerning the Operations management position that must hold an SRO license. At least one Operations Superintendent or the Operations Manager will continue to maintain an SRO license. The proposed change to TS 5.3.1 is a clarification regarding the qualifications of the Operations Manager. This clarification states that TS 5.2.2.f specifies the requirements for the Operations Manager regarding the holding of an SRO license. The training, qualification and experience requirements for Operations management personnel will continue to satisfy the Unit Staff Qualifications as described in the applicable TS 5.3.1.

   This change does not impact any accident initiators or analyzed events. It does not impact any assumed mitigation capability for any accident or transient event. The change does not involve the addition or removal of any equipment or any design changes to the facility. As the proposed change is administrative in nature, operation of the facility in accordance with the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: No.

The proposed change to TS 5.2 revises the requirement concerning the Operations management position that must hold an SRO license. At least one Operations Superintendent or the Operations Manager will continue to maintain an SRO license. The proposed change to TS 5.3.1 is a clarification regarding the qualifications of the Operations Manager. This clarification states that TS 5.2.2.f specifies the requirements for the Operations Manager regarding the holding of an SRO license. The training, qualification and experience requirements for Operations management personnel will continue to satisfy the Unit Staff Qualifications as described in the applicable TS 5.3.1.

This change does not involve any physical modifications to plant structures, systems, or components (SSCs), or the manner in which SSCs are operated, maintained, modified, tested, or inspected. In addition, there is no change in the types or increases in the amounts of effluents that may be released offsite, and there is no increase in individual or cumulative occupational radiation exposure. As the proposed change is administrative in nature, operation of the facility in accordance with the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed change to TS 5.2 revises the requirement concerning the Operations management position that must hold an SRO license. At least one Operations Superintendent or the Operations Manager will continue to maintain an SRO license. The subject Operations Superintendent will be qualified to fill the Operations Manager position and have the same management authority over licensed operators as the Operations Manager. The proposed change to TS 5.3.1 is a clarification regarding the qualifications of the Operations Manager. This clarification states that TS 5.2.2.f specifies the requirements for the Operations Manager regarding the holding of an SRO license. The training, qualification and experience requirements for Operations management personnel will continue to satisfy the Unit Staff Qualifications as described in the applicable TS 5.3.1.

This change does not involve any physical modifications to SSCs, or the manner in which SSCs are operated, maintained, modified, tested, or inspected. The change does not alter the manner in which safety limits, limiting safety system settings, or limiting conditions for operation are determined. The setpoints at which protective actions are initiated are not altered by the change. As the proposed change is administrative in nature, operation of the facility in accordance with the proposed amendment does not involve a significant reduction in a margin of safety.

Based on the above, SNC concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.2 Applicable Regulatory Requirements / Criteria

The following lists the regulatory requirements and plant-specific design bases related to the proposed change to TS 5.2 and TS 5.3.1.

Regulatory Requirement

- Title 10 of the Code of Federal Regulations (CFR), Section 50.54(l) states, "The licensee shall designate individuals to be responsible for directing the licensed activities of licensed operators. These individuals shall be licensed as senior operators pursuant to part 55 of this chapter."

4.3 Precedent

In the case of Oyster Creek Generating Station, AmerGen Energy, LLC was granted a similar TS change on March 25, 2002 (Reference 1). Also, for Cooper Nuclear Station, Nebraska Public Power District was granted a similar TS change on December 15, 2005 (Reference 2). In addition, the proposed change is consistent with the intent of NUREG-1430, Revision 3, "Standard Technical Specifications Babcock and Wilcox Plants" (Reference 3), NUREG-1431, Revision 3, "Standard Technical Specifications Westinghouse Plants" (Reference 4), NUREG-1432, Revision 3, "Standard Technical Specifications Combustion Engineering Plants" (Reference 5), NUREG-1433, Revision 3, "Standard Technical Specifications General Electric Plants, BWR/4" (Reference 6), and NUREG-1434, Revision 3, "Standard Technical Specifications General Electric Plants, BWR/6" (Reference 7), and thus, has been implemented throughout the industry.

4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 Environmental Consideration

10 CFR 51.22(c)(9) provides criteria for identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed license amendment will not:

1. Involve a significant hazards consideration,

2. Result in a significant change in the types, or a significant increase in the amounts, of any effluents that may be released offsite, or

3. Result in a significant increase in individual or cumulative occupational radiation exposure.

SNC has evaluated the proposed changes and determined the changes do not involve (1) a significant hazards consideration, (2) a significant change in the types or significant increase in the amounts of any effluents that may be released off-site, or (3) a significant increase in the individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9), and an environmental assessment of the proposed change is not required.

6.0 References

1. Oyster Creek Nuclear Generating Station, "Issuance of Amendment Re: Qualification of Senior Manager – Operations," March 25, 2002 (TAC No. MB2242).

2. Cooper Nuclear Station, "Issuance of Amendment Re: Unit Staff Qualifications," December 15, 2005 (TAC No. MC7346).

3. NUREG-1430, Revision 3, "Standard Technical Specifications Babcock and Wilcox Plants," June 2004.

4. NUREG-1431, Revision 3, "Standard Technical Specifications Westinghouse Plants," June 2004.

5. NUREG-1432, Revision 3, "Standard Technical Specifications Combustion Engineering Plants," June 2004.

6. NUREG-1433, Revision 3, "Standard Technical Specifications General Electric Plants, BWR/4," June 2004.

7. NUREG-1434, Revision 3, "Standard Technical Specifications General Electric Plants, BWR/6," June 2004.

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Enclosure 2

Technical Specifications Markup Pages

5.2 Organization

5.2.2 Unit Staff (continued)

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines for the minimum shift compliment defined in Specifications 5.2.2.a and b and health physics technicians shall be reviewed and approved by the Plant Manager, his designee, or by higher levels of management.

Any deviation from the above guidelines for key maintenance personnel shall be reviewed and approved by the Maintenance Manager or his designee.

f. ~~The Plant Manager or the Operations Manager shall hold an SRO license.~~

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the responsible SRO in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. The same individual may fill this position for both units.

The Operations Manager or at least one Operations Superintendent shall hold an SRO license.

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff, including Vice President – Farley and Plant Manager, shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions and the supplemental requirements specified in 10 CFR 55, except for (1) the senior individual in charge of Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. Personnel who complete an accredited program which has been endorsed by the NRC shall meet the requirements of the accredited program in lieu of the above.

The Operations Manager shall meet or exceed the above requirements except that Technical Specification 5.2.2.f shall specify the requirements regarding the holding of an SRO license.

5.2 Organization

5.2.2 Unit Staff

e. (continued)

Any deviation from the above guidelines shall be authorized by the Plant Manager or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

f. ~~The Operations Manager shall hold an active or inactive SRO license.~~

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the shift supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

The Operations Manager or at least one Operations Superintendent shall hold an SRO license.

5.2 Organization

5.2.2 Unit Staff

e. (continued)

Any deviation from the above guidelines shall be authorized by the Plant Manager or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

f. ~~The Operations Manager shall hold an active or inactive SRO license.~~

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the shift supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

The Operations Manager or at least one Operations Superintendent shall hold an SRO license.

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff, including Vice President – Hatch and Plant Manager, shall either meet or exceed the minimum qualifications of ANSI N18.1-1971, or shall meet or exceed the minimum qualifications of the accredited program requirements for those positions stipulated in Enclosure 1 to letter NL-07-1925. The senior individual in charge of Health Physics shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

The Operations Manager shall meet or exceed the above requirements except that Technical Specification 5.2.2.f shall specify the requirements regarding the holding of an SRO license.

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff, including Vice President – Hatch and Plant Manager, shall either meet or exceed the minimum qualifications of ANSI N18.1-1971, or shall meet or exceed the minimum qualifications of the accredited program requirements for those positions stipulated in Enclosure 1 to letter NL-07-1925. The senior individual in charge of Health Physics shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

The Operations Manager shall meet or exceed the above requirements except that Technical Specification 5.2.2.f shall specify the requirements regarding the holding of an SRO license.

5.2.2 Unit Staff (continued)

event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;

2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the applicable department manager or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual excess overtime shall be reviewed monthly by the Plant Manager or his designee to assure that excessive hours were authorized and that they do not become routine.

f. ~~The Operations Manager shall hold an SRO license.~~

g. An individual shall be assigned who provides technical support in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall be available for duty when the plant is in modes 1-4. At other times, this individual is not required. In addition, this individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. This position may also be filled by the Shift Superintendent or

The Operations Manager or at least one Operations Superintendent shall hold an SRO license.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff, including Vice President – Vogtle and Plant Manager, shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, Revision 2, 1987, and, for licensed staff, 10 CFR 55.59. Prior to meeting the recommendations of Regulatory Guide 1.8, Revision 2, personnel may be trained to perform specific tasks and will be qualified to perform those tasks independently. Personnel who complete an accredited program which has been endorsed by the NRC shall meet the requirements of the accredited program in lieu of the above.

The Operations Manager shall meet or exceed the above requirements except that Technical Specification 5.2.2.f shall specify the requirements regarding the holding of an SRO license.

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Enclosure 3

Technical Specifications Clean Typed Pages

5.2 Organization

5.2.2 Unit Staff (continued)

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines for the minimum shift compliment defined in Specifications 5.2.2.a and b and health physics technicians shall be reviewed and approved by the Plant Manager, his designee, or by higher levels of management.

Any deviation from the above guidelines for key maintenance personnel shall be reviewed and approved by the Maintenance Manager or his designee.

f. The Operations Manager or at least one Operations Superintendent shall hold an SRO license.

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the responsible SRO in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. The same individual may fill this position for both units.

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff, including Vice President – Farley and Plant Manager, shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions and the supplemental requirements specified in 10 CFR 55, except for (1) the senior individual in charge of Health Physics who shall meet or exceed the qualifications of Regulatory Guide 1.8, Septernber 1975. Personnel who complete an accredited program which has been endorsed by the NRC shall meet the requirements of the accredited program in lieu of the above. The Operations Manager shall meet or exceed the above requirements except that Technical Specification 5.2.2.f shall specify the requirements regarding the holding of an SRO license.

5.2 Organization

5.2.2 Unit Staff

e. (continued)

Any deviation from the above guidelines shall be authorized by the Plant Manager or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

f. The Operations Manager or at least one Operations Superintendent shall hold an SRO license.

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the shift supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

5.2 Organization

5.2.2 Unit Staff

e. (continued)

Any deviation from the above guidelines shall be authorized by the Plant Manager or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

f. The Operations Manager or at least one Operations Superintendent shall hold an SRO license.

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the shift supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff, including Vice President – Hatch and Plant Manager, shall either meet or exceed the minimum qualifications of ANSI N18.1-1971, or shall meet or exceed the minimum qualifications of the accredited program requirements for those positions stipulated in Enclosure 1 to letter NL-07-1925. The Operations Manager shall meet or exceed the above requirements except that Technical Specification 5.2.2.f shall specify the requirements regarding the holding of an SRO license. The senior individual in charge of Health Physics shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff, including Vice President – Hatch and Plant Manager, shall either meet or exceed the minimum qualifications of ANSI N18.1-1971, or shall meet or exceed the minimum qualifications of the accredited program requirements for those positions stipulated in Enclosure 1 to letter NL-07-1925. The Operations Manager shall meet or exceed the above requirements except that Technical Specification 5.2.2.f shall specify the requirements regarding the holding of an SRO license. The senior individual in charge of Health Physics shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

5.2.2 Unit Staff (continued)

event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;

2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the applicable department manager or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual excess overtime shall be reviewed monthly by the Plant Manager or his designee to assure that excessive hours were authorized and that they do not become routine.

f. The Operations Manager or at least one Operations Superintendent shall hold an SRO license.

g. An individual shall be assigned who provides technical support in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall be available for duty when the plant is in modes 1-4. At other times, this individual is not required. In addition, this individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. This position may also be filled by the Shift Superintendent or

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff, including Vice President – Vogtle and Plant Manager, shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, Revision 2, 1987, and, for licensed staff, 10 CFR 55.59. Prior to meeting the recommendations of Regulatory Guide 1.8, Revision 2, personnel may be trained to perform specific tasks and will be qualified to perform those tasks independently. Personnel who complete an accredited program which has been endorsed by the NRC shall meet the requirements of the accredited program in lieu of the above. The Operations Manager shall meet or exceed the above requirements except that Technical Specification 5.2.2.f shall specify the requirements regarding the holding of an SRO license.