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 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Responds to Generic Ltr 82-12, "Nuclear Power Plant Staff Working Hours." Administrative control procedures revised to reflect overtime guidelines. Revision of Tech Specs to incorporate overtime guidelines not necessary.

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Iowa Electric Light and Power Company

October 29, 1982
LDR-82-280

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

Mr. Harold Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Nuclear Plant Staff Working Hours (GL-82-12)

Dear Mr. Denton:

We are in receipt of your Generic Letter 82-12 concerning Nuclear Power Plant Staff Working Hours. In accordance with your request, DAEC administrative control procedure ACP-1401.12, Shift Manning, has been revised to reflect the guidance of overtime for DAEC personnel identified in your letter. A second DAEC procedure, ACP-1404.1, Shift Organization, Operation, and Turnover, is being revised to incorporate the ACP-1401.12 guidance.

Generic Letter 82-12 also states that its predecessor, Generic Letter 82-02, had requested revision of Technical Specifications to reflect the working hours guidance. This statement appears to be inaccurate since 82-02 indicated that the attached policy statement was being forwarded for information and that the NRC would contact licensees again following completion of Regulatory Guide 1.33 and revision of NUREG-0737. In any event, we assume that, as usual, you plan to issue standard Technical Specifications to advise licensees of language which you deem appropriate.

For the reasons states below, we do not believe the revision of Technical Specifications to incorporate overtime guidelines is either an efficient utilization of resources or necessary to protect the health and safety of the public.

- (1) The overtime policy most recently approved by the NRC and transmitted by Generic Letter 82-12 is deliberately incorporated in NRC guidelines, which explicitly recognize that appropriate members of a Licensee's management may authorize deviations. Such guidelines should not be elevated to the status of requirements through incorporation in Technical Specifications.

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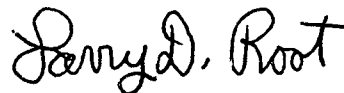
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- (2) Once administrative controls have been established to implement NRC policy and DAEC practice, incorporation into Technical Specifications will not further increase protection of health and safety.
- (3) As the Commission acknowledged in a recently-proposed amendment to Part 50, reduction of the volume of technical specifications will focus attention on matters of true safety concern and produce an improvement in reactor safety. (See 47 Fed. Reg. 13,369.) Incorporation of the working hours guidelines would be inconsistent with that philosophy.
- (4) NUREG-0737, which contained Commission-approved guidance, covered both minimum shift crew staffing levels and overtime under item 1.A.3.3, Shift Manning. It specifically stated that Technical Specifications would be required on minimum shift crew manning but did not mandate Technical Specifications for overtime restrictions.
- (5) The proposed regulation referred to in (3) above would establish "Supplemental Specifications" that could be modified without the current process of proposing a change, obtaining NRC prior review, and formally obtaining NRC-issued amendments. At most, the work hours guidelines should be incorporated in such Supplemental Specifications. We note that the NRC's guidance regarding overtime has changed several times in the last two years (IE Circular 80-02; July 31, 1980 letter; NUREG-0737; Generic Letter 82-02; Generic Letter 82-12). Substantial resources were saved by not having to modify Technical Specifications after each change.

We hope that our views on this subject will assist you in developing generic requirements.

Very truly yours,



Larry D. Root
Assistant Vice President
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