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                          Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests extension in implementation of shift staffing requirements of NUREG-0654, Table B-1, "Min Staffing Requirements for Nuclear Power Plant Emergencies." Rad/chem technicians will be placed on shift no later than 830201.

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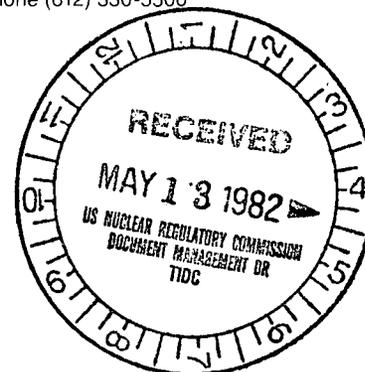


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May 7, 1982

Director  
Office of Nuclear Reactor Regulation  
U S Nuclear Regulatory Commission  
Washington, DC 20555



MONTICELLO NUCLEAR GENERATING PLANT  
Docket No. 50-263 License No. DPR-22

Delay in Implementation of Shift Staffing Requirements  
of NUREG-0654, Table B-1

NUREG-0654, Table B-1, "Minimum Staffing Requirements for Nuclear Power Plant Emergencies", requires that each licensee have full-time shift rad/chem technicians by July 1, 1982. The purpose of this letter is to request an extension in the required implementation date for having rad/chem technician shift coverage at Monticello.

Our efforts to meet this requirement have centered on interviewing and hiring personnel with two or more years of direct experience in the specialty of rad/chemistry. Of the five personnel allocated, we have hired three personnel who meet the ANSI N18.1-1971 two-year working experience requirement. We believe that by the first part of May, 1982 the other two positions will be filled by personnel of similar backgrounds.

Once all of the new chemistry shift technicians are on site, they will be enrolled in a BWR Chemistry Training Program. We anticipate a 3-4 week chemistry course (BWR specific) to begin in early May, 1982. The classroom training will be supplemented by Qual Card training (on-the-job/practical skills) covering such areas as Emergency Plan procedures (dose projection and sampling/analysis) and basic plant chemistry routines. This is the minimum training we feel is necessary for a "qualified" (two or more years working experience) individual to work on shift as a rad/chem technician.

It is our belief that additional training should be provided for the shift rad/chem technicians before they are assigned to work on shift. The additional training will include more detailed BWR chemistry (core damage and assessment, effluent sampling/analysis, fuel chemistry, corrosion chemistry, and water chemistry for example), systems overview and health physics cross-training. The additional training will accomplish several things:

1. The rad/chem technician will be a more confident person when "on shift".
2. The rad/chem technician will be more useful to the plant for performing normal plant-related chemistry duties.

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NORTHERN STATES POWER COMPANY

Director of NRR  
May 7, 1982  
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3. The rad/chem technician will have a more complete chemistry/plant background to respond in case of an emergency.

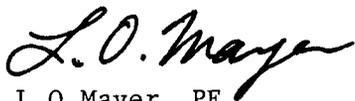
This additional training can be completed in six to seven months. If the rad/chem technicians were on shift, the additional training would take one or two years to complete.

For the above reasons we request an extension for the Table B-1 requirement for having rad/chem technicians on shift by July 1, 1982. Rad/chem technicians will be placed on shift as soon as they are satisfactorily trained but no later than February 1, 1983. In the interim, we will have completed by July 1, 1982, the following:

1. The health physics technicians now working on shift will be trained in emergency plan chemistry procedures (dose projection and sampling/analysis).
2. Non-shift health physics technicians will be trained in emergency plan chemistry procedures.
3. A non-shift, fully trained rad/chem or health physics technician will be on call with a radio-pager such that he can respond to a plant emergency within 30 minutes.

We believe the effort we have made in hiring ANSI N18.1-1971 qualified personnel and the additional time taken to more completely train the rad/chem technicians will enhance and strengthen our chemistry program and our ability to respond in case of an emergency.

Please contact us if you have any questions related to our request.



L O Mayer, PE  
Manager of Nuclear Support Services

LOM/DMM/bd

cc: Regional Administrator-III, NRC  
NRR Project Manager, NRC  
Resident Inspector, NRC  
G Charnoff