



Northern States Power Company

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November 16, 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

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

Additional Information Related to
Implementation of NRC Guidelines for Working Hours

Ref: (a) Letter dated October 7, 1982 from NSP, to Director, NRR, NRC,
"Implementation of NRC Guidelines for Working Hours"

The purpose of this letter is to provide a revised commitment to the guidelines contained in NRC Generic Letter 82-12 dated June 15, 1982. Generic Letter 82-12 established Commission guidelines on working hours. Our original letter on this issue, reference (a), did not correctly state our problems involving implementation of the Commission's 72 hour/week limitation on work or our proposed alternative limitations on maximum hours worked per week.

Commission guidelines for working hours originated as a TMI Action Plan item. It has been designated NUREG-0737 Item I.A.1.3.1. We are requesting approval of a technical deviation from this item in the case of the 72 hour/week limitation.

As noted in reference (a), with current staffing levels we must routinely exceed the 72 hour/week guideline during plant outages. We cannot claim that these exceptions to the 72 hour/week guideline are "unusual circumstances" permitted by Generic Letter 82-12 following management review. As an alternative to this guideline, Northern States Power Company will establish the following policy:

1. Overtime will be limited for all nuclear plant staff personnel so that total work time does not exceed 16 hours in any 24 hour period, 24 hours in any 48 hour period, nor 84 hours in any seven-day period. Individuals will not be required to work more than 15 consecutive days without 2 consecutive days off.

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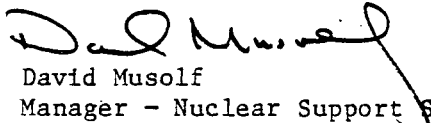
NORTHERN STATES POWER COMPANY

Director of NRR
November 16, 1982
Page 2

2. Exceptions to the above limitations shall only be granted after review and approval of each individual situation on a case basis by the Plant Manager or his designee. During plant emergencies the Emergency Director, who is normally the Plant Manager, shall have exception authority.
3. Shift Technical Advisor (STA) and Shift Emergency Coordinator (SEC) on-site rest time periods shall not be considered as hours worked when determining the total work time for which the above limitations apply.

We believe these restrictions address the intent of the NRC's concern over fatigue to workers involved in safety-related functions at nuclear plants.

Please contact us if you have any questions concerning our implementation of the requirements of Generic Letter 82-12 at our plants or the alternative measures we have proposed.


David Musolf
Manager - Nuclear Support Services

DMM/bd

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