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SUBJECT: Requests extension to 840215 implementation of licensed operator staffing requirements.

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September 29, 1983

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

Request for Extension in Implementation Date  
of Licensed Operator Staffing Requirements  
of 10 CFR Part 50, Section 50.54(m)(2)

In accordance with the provisions of 10 CFR Part 50, Section 50.54(m)(3) published in the Federal Register on July 11, 1983 an extension in the required implementation date for 10 CFR Part 50, Section 50.54(m)(2) is requested from January 1, 1984 to February 15, 1984. The 1984 refueling outage at Monticello is scheduled to begin prior to February 15, 1983 and will last for approximately six months. This extension involves a period of less than seven weeks. Two provisions of the new rule require this extension:

1. The presence of a Senior Licensed Operator (SRO) in the Control Room at all times when the reactor is not in the cold shutdown or refueling modes.
2. The requirement for two SROs on site at all times when the reactor is not in the cold shutdown or refueling modes.

The requested extension will allow modifications to be made to the Shift Supervisor's office to bring this area within the defined limits of the Control Room. The requested extension will also allow additional personnel to obtain SRO licenses. Each of these issues is discussed in detail below along with demonstration of need for the schedule exemption.

Presence of SRO in the Control Room

The rule for having a Senior Licensed Operator in the Control Room is a problem for Monticello because there are only two operators who now have SRO licenses. The only personnel assigned to the Control Room are operator classification personnel. There are no requirements in our labor agreement for any of the classifications to hold an SRO license.

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This leaves us primarily with two choices. One is to negotiate a requirement for the Lead Plant Equipment and Reactor Operator (LPE & RO) classification to hold an SRO license; the other choice is to place a non-union SRO licensed person in the Control Room. Due to the time constraints involved with negotiating and upgrading all LPE & RO licenses to SRO, we are forced to take the second choice.

Presently there are six Site Superintendents and three Shift Supervisors who hold SRO licenses. These are non-union supervisory shift personnel. The Site Superintendents and Shift Supervisors are not restricted to any one area of the plant. There is generally one of these individuals located in the Shift Supervisor's office, which is adjacent to the Control Room. If one of these individuals is moved to the Control Room, it will either require many people to enter the control room for routine processing of work control, testing, and other documentation; or it will require that we restrict the other individual to the Shift Supervisor's office. Both of these situations are undesirable. One would be a major distraction to the Control Room operators and the other would prevent an SRO from touring the plant to provide expertise and guidance to the lower classification operators.

To eliminate these disadvantages, we will perform modifications necessary to allow us to define the main Control Room and the Shift Supervisor's office as the "Control Room" for the purposes of the rule. These modifications will permit the intent of the rule to be met as stated in the following extract from the supplementary information published in the Federal Register:

The senior operator in the Control Room is expected to normally spend most of the time in that portion of the Control Room where there is direct and prompt access to information on current plant conditions and where the operator at the controls can be supervised. As duties may necessitate, the senior operator is to have the flexibility to periodically move to other parts of the Control Room. However, the senior operator should remain, at all times, in a position to provide prompt assistance to the reactor operators when requested. Additionally, this means that the senior operator must either (1) be in sight of, or in the audible range of, the reactor operators at the controls, or (2) be in the audible range of the control room annunciators. This is necessary so that the senior operator's training and knowledge will be immediately available as needed.

To meet these requirements, the following features now exist or will be provided:

1. The Shift Supervisor's office is immediately adjacent to the Control Room. Individuals in this office have immediate and unimpeded access to the main Control Room. Access is via a card reader system. In the event of failure of the card reader system, the Shift Supervisor has a key immediately available for main Control Room entry. Refer to the attached sketch.

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2. An intercom system exists between the Shift Supervisor's office and the main Control Room for immediate communication. In addition, there are normal telephone links between the two areas.
3. The following modifications will be made to enhance the information available in the Shift Supervisor's office and to minimize distractions to the SRO.
  - a. A computer alarm CRT which displays numerous plant alarm conditions will be provided in the Shift Supervisor's office.
  - b. A computer parameter display CRT which normally has such items as power level, reactor pressure, and generator output displayed will be provided in the Shift Supervisor's office.
  - c. A camera will be mounted in the Control Room with a CRT provided in the Shift Supervisor's office. The camera will provide a panoramic view of the Control Room's main panels.
  - d. Reactor pressure, reactor water level, reactor power and drywell pressure recorders will be provided in the Shift Supervisor's office.
  - e. An annunciator panel will be provided in the Shift Supervisor's office to specifically annunciate the following:
    - 1) reactor level (outside normal limits)
    - 2) reactor pressure (outside normal limits)
    - 3) reactor scram
    - 4) drywell pressure (outside normal limits)
  - f. Access to the Shift Supervisor's office will be controlled by the use of card readers on all three access doors to the Shift Supervisor's office. Only individuals authorized access to the main Control Room will be authorized access to the Shift Supervisor's office.
  - g. A common annunciator will be provided that will annunciate all front panel Control Room alarms.

The modifications described above are fairly extensive and require interfacing with Control Room panels and indicators. It is prudent to schedule many of these modifications for the next refueling outage when the plant will be in a shutdown condition. An extension in the January 1, 1984 implementation date is therefore requested to permit this work to be done during the 1984 refueling outage

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Requirement for Two SROs On Site


The rule for having two SROs on-site when the reactor is not in cold shutdown or refueling modes is a problem because we have two Shift Supervisors who do not have their SRO licenses. These individuals have failed a previous SRO license exam. They are presently on a self-study program and will be participating in a formal training program in November, December and January. The SRO license exam is scheduled to be given in January, 1984. These two individuals will take their exams at that time.

An extension in the January 1, 1984 implementation date is therefore requested to permit these two individuals to complete the requirements for SRO licensing.

Northern States Power Company is firmly committed to hiring and training the necessary number of operators required by the new rule. A schedule exemption of less than seven weeks is being sought for two requirements of the rule related to the presence of an SRO in the Control Room and the number of SROs required on shift. These two requirements will be met on return to service following the next refueling outage. We believe this is a reasonable target date for achieving full compliance. All other requirements of the rule will be met on January 1, 1984.

An active hiring and training program is in effect to assure that an adequate number of well trained operations personnel are available. We do not anticipate significant adverse effects of the rule on plant safety due to excessive overtime, degradation in training, or a reduction in the number of shifts available.

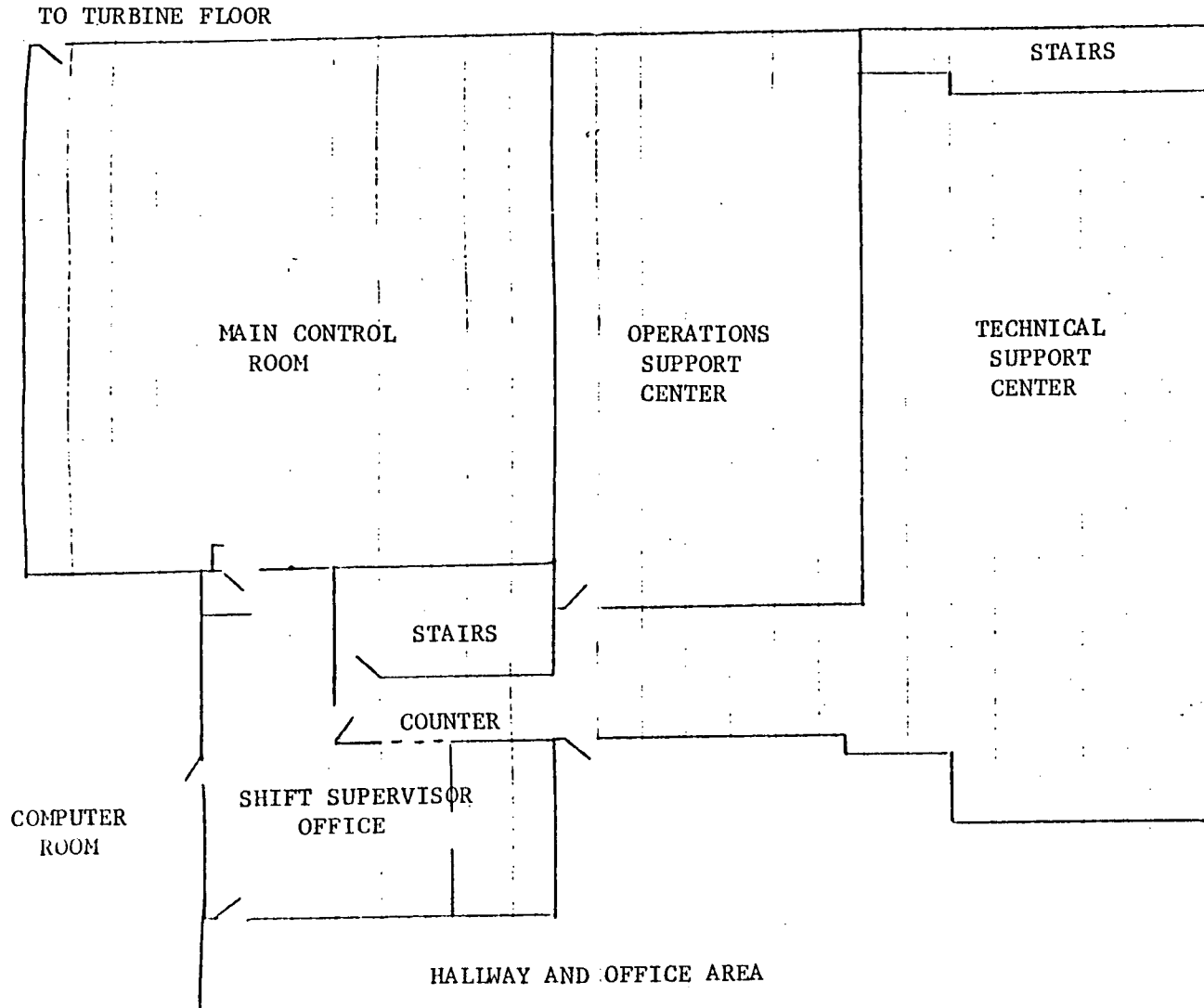
Please contact us if you have any questions related to our request for extension in the implementation date for this rule.

  
David Musolf  
Manager - Nuclear Support Services

DMM/dab

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

Attachment



MONTICELLO CONTROL ROOM, SHIFT SUPERVISOR'S OFFICE, OPERATIONS SUPPORT CENTER, AND TECHNICAL SUPPORT CENTER LAYOUT