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September 28, 1982

Director, Office of Nuclear Reactor Regulation  
Attention: D. M. Crutchfield, Chief  
Operating Reactors Branch No. 5  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206  
NUREG-0737, Item I.A.1.3 - Shift Manning  
Nuclear Power Plant Staff Working Hours  
San Onofre Nuclear Generating Station  
Unit 1

- Reference:
1. Letter, D. G. Eisenhut, to All Licensees of Operating Plants, Nuclear Power Plant Staff Working Hours (Generic Letter No. 82-02), February 8, 1982
  2. Letter, D. G. Eisenhut, to All Licensees of Operating Plants, Nuclear Power Plant Staff Working Hours (Generic Letter No. 82-12), June 15, 1982
  3. Letter, K. P. Baskin, SCE, to D. M. Crutchfield, NRC, Post-TMI Requirements, June 4, 1982

The subject NUREG-0737 requirement provided Licensees with guidance on minimum shift crew composition and overtime criteria. The guidance on use of overtime for plant staff was revised by the issuance of the "Policy on Factors Causing Fatigue of Operating Personnel at Nuclear Reactors" enclosed with Reference 1. The guidance in Reference 1 indicated that Licensees should establish overtime controls in accordance with the attached policy. The guidance provided to us in Reference 2 specifically referenced the subject NUREG-0737 requirement, delineated the same overtime controls indicated in Reference 1, and requested that Licensees submit a change to their technical specifications in addition to establishing procedures to control the use of overtime at nuclear power plants, in accordance with the NRC policy statement.

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Mr. D. M. Crutchfield

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Responsive to the NRC requirements to establish controls on the use of overtime, an operating memorandum was issued at San Onofre Unit 1 to limit the use of overtime for operating personnel. This operating memorandum was revised, as indicated in Reference 3, to incorporate the guidance provided to us in Reference 1. The guidance in Reference 2, as discussed above, requires the same overtime controls as Reference 1, but also requires us to submit technical specifications defining the overtime controls at San Onofre Unit 1.

We have been informed, by discussions with members of your staff on September 1, 1982, that you are attempting to issue model technical specifications to clarify the intent of how the "overtime policy" should be implemented. By October 1, 1982 we will implement the necessary procedures required by Reference 2 to control the use of overtime at San Onofre Unit 1, but we will not submit a technical specification for your review pending receipt of the above discussed model technical specifications.

If you have any questions concerning the above discussed information, please let me know.

Very truly yours,

*KP Baskin*