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November 30, 1984

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

Gentlemen:

Subject: Docket No. 50-206
Proposed Change No. 119 to the Technical Specifications
San Onofre Nuclear Generating Station
Unit 1

- References:
1. Letter, W. A. Paulson, NRC, to Kenneth P. Baskin, SCE, Proposed Change No. 119 to the Technical Specifications, September 5, 1984
 2. SECY-81-440, W. J. Dircks, to the Commissioners, Nuclear Power Plant Staff Working Hours, July 22, 1984
 3. NUREG/CR-1764, Review of Staffing Requirements for Near Term Operating License Facilities, October, 1980

Reference 1 requested that we provide additional information to resolve NRC concerns regarding the content of our Proposed Change No. 119 to the San Onofre Unit 1 Technical Specifications. In response to this request the following information is provided to resolve each concern. To facilitate your review, we have reiterated each of your concerns followed by our response.

NRC Concern:

1. You have proposed to define "heavy overtime" as "greater than 25%." By such a definition, work schedules of up to 50 hours per week could be routinely scheduled. In view of the Commission's goal of an "8-hour day, 40 hour week while the plant is operating," we find such routine use of overtime at this level inconsistent with conscientious efforts to meet the goal. We believe the goal should be zero overtime when the plant is operating and that any individual overtime in excess of 10% per week should be considered "heavy."

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SCE Response:

Our understanding of the policy statement issued by the Commission entitled "Factors Causing Fatigue of Operating Personnel of Nuclear Reactors" is that a significant reduction in the effectiveness of personnel should not occur as a result of overtime work. Consistent with this understanding, the use of "greater than 25%" overtime is not intended to define "heavy overtime" per se, rather it represents a level of overtime, based on documented information, which should not significantly reduce the effectiveness of personnel. As stated in Reference 2, it has been the experience in other industries, both in the U.S. and abroad, that persons working 12 hour shifts have increased worker morale, with no decrease in efficiency and with little effect on accident rates. Additionally, Option 1 of Reference 3 states, for most tasks analyzed, performance and error rates stabilize after the first 4 hours of a "shift," even for extended shift schedules. These references indicate that overtime up to 50% would only minimally, if at all, reduce the effectiveness of personnel, and in fact, that the threshold of overtime that would produce a significant reduction on the effectiveness of personnel, while not quantified, would be greater than 50%.

We have established procedures such that it is highly unlikely that the effectiveness of personnel will be significantly reduced by working overtime. These procedures require additional management approvals at overtime levels "greater than 25%." Finally, while we did not intend to define "heavy overtime," such a definition, if based on the Commission Policy Statement and the documented information discussed above, should be "in excess of 25%." In order to clarify the use of "greater than 25%" overtime, the Proposed Specification should be revised.

NRC Concern:

2. You have proposed that first line supervision be authorized to determine whether plant conditions constitute "unforeseen problems" for the purpose of applying the overtime guidelines. We believe this is not sufficiently high in the management structure to provide the perspective necessary for such a decision. We believe such a determination should be made by the Station Manager, Deputy Station Manager or Operations Manager.

SCE Response:

The Proposed Specification explicitly defines "unforeseen problems". This definition has been previously approved by the Station Manager, Deputy Station Manager, and Manager, Operations. Therefore, it is not necessary for first line supervision to determine whether plant conditions constitute "unforeseen problems," and the Proposed Specification should be revised.

NRC Concern:

3. If we understand your proposal correctly, you intend that time spent consuming food (meal time) is not to be included when calculating a work period, but, rather, is to be counted as part of the break time. While this is appropriate when one considers a normal eight hour shift, we do not consider it appropriate when significant overtime is involved. In the latter case, we consider it important that individuals have a minimum break period of at least eight hours. Your proposal would further reduce the length of the break by taking credit for meal time(s) occurring during the work period. In such a case, the break period could be reduced to as little as six hours. In view of commuting time requirements, we consider such a break period inadequate to assure reasonable rest and alertness. We also find the inclusion of meal time(s) in the break period an unjustified extension of the Commission's policy.

SCE Response:

The following clarification should facilitate your understanding of how we are handling time spent consuming food (meal time):

1. The time spent as meal time during normal work periods will not be included when calculating the hours worked or the break.
2. The time recorded and paid as "meal time" in accordance with SCE policy or contractual agreements when working overtime hours will not be included when calculating the hours worked but will be included when calculating the break. Specifically, this time simply represents an administrative entry on the time sheet and not extra hours spent at the work location. Therefore, it is appropriately considered part of the break.

In order to reflect the clarification discussed above, the Technical Specification should be revised.

The above discussion indicates that the proposed specifications should be revised in response to the stated NRC concerns. Accordingly, enclosed for your consideration is Revision 1 to Proposed Change No. 119. If you have any questions, please let us know.

Very truly yours,



cc: E. McKenna, NRR Project Manager
F. R. Huey, USNRC Resident Inspector
G. B. Zwetzig, Region V Staff Reviewer