

MEMORANDUM FOR: Elinor G. Adensam, Director
 Project Directorate II-1
 Division of Reactor Projects I/II

FROM: Ronnie Lo, Senior Project Manager
 Project Directorate II-1
 Division of Reactor Projects I/II

SUBJECT: OVERTIME POLICY, H.B. ROBINSON STEAM ELECTRIC PLANT, UNIT
 NO. 2 (HBR) (TAC 74814)

I have had a number of discussions with the licensee (Jim Kloosterman, Director of Regulatory Compliance, and Robert Prunty, Principal Engineer) on the subject issue. During a telephone conference with the licensee on December 22, 1989, the licensee responded to the three areas of concern as follows:

1. The licensee's overtime limits do not apply to auxiliary operators, maintenance personnel, or health physics personnel.

The licensee has drafted procedures which would include auxiliary operators, maintenance personnel and health physics personnel in the overtime limits. These procedures are under plant management review and should be finalized in about 2-4 weeks.

2. The licensee's overtime limits apply only when the reactor coolant system is greater than 200 degrees F or when fuel is being moved within the reactor pressure vessel.

In practice, the licensee's management does not perceive a difference in the status of the plant as far as overtime limits are concerned. The licensee is, therefore, willing to propose TS changes to formalize this practice.

3. The licensee's policy applies different limits on working hours, and many differences exist in the wording of overtime rules.

The licensee believes that its limits, in practice, are comparable if not more restrictive, in some instances, than the GL 82-12 guidance. The licensee would work towards changes to those differences and submit appropriate TS amendment requests where necessary. The licensee would continue to discuss these changes with the NRC Project Manager.

Original Signed By:

Ronnie H. Lo, Senior Project Manager
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