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 RECIPIENT AFFILIATION: Division of Licensing

SUBJECT: Clarifies util 801215 position re NUREG-0737 Item I.A.1.3 re limitations on overtime required of licensed operators. Util maintains that normal facility manning policies meet NRC guidance. Addl limits will create administrative burden.

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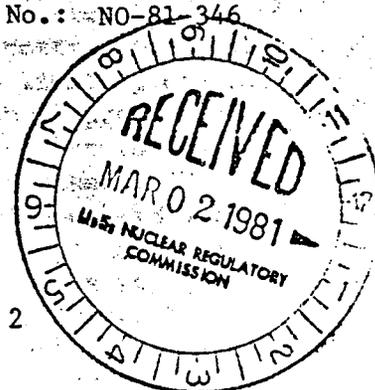
Carolina Power & Light Company

February 26, 1981

File: NG-3514(B)  
File: NG-3514(R)

Serial No.: NO-81-346

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
United States Nuclear Regulatory Commission  
Washington, D. C. 20555



BRUNSWICK STEAM ELECTRIC PLANT UNIT NOS. 1 AND 2  
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LICENSE NO. DPR-23

LIMITATIONS ON OVERTIME REQUIRED OF LICENSED OPERATORS

Dear Mr. Eisenhut:

Your letter of July 31, 1980 and Item I.A.1.3 of NUREG-0737, "Clarification of TMI Action Plan Requirements," described proposed restrictions on the use of overtime for plant staff members who perform safety-related functions. Carolina Power & Light Company's (CP&L) letter of December 15, 1980, deferred commitment to the proposed restrictions. This letter further clarifies CP&L's position on this matter.

While CP&L agrees with the concept of limiting overtime for key personnel to the extent possible, the restrictions proposed by Item I.A.1.3 could result in significant scheduling confusion and could create hardships for some operators by requiring them to work odd hours. The operators at Robinson and Brunswick work an eight-hour rotating shift schedule. Each shift lasts seven days. The operator's week for pay purposes begins and ends at midnight each Friday. The schedule is designed to give the operator a 40-hour work week, however, the large increase in training requirements and the changes in staffing requirements do not always permit scheduling which is compatible with the rigid restrictions of Item I.A.1.3. The individual restrictions of Item I.A.1.3 are addressed below:

NRC Position (1): An individual should not be permitted to work more than twelve hours straight (not including shift turnover time).

CP&L Response: CP&L agrees that more than 12 hours of duty on the control board would be excessive, and it is CP&L's policy not to normally schedule individuals for more than a 12-hour work period (not including shift turnover time). CP&L, however, does not believe that time on the control boards should be rigidly limited to four hours of continuous duty if the operator is to work more than eight

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continuous hours. The additional administrative load on the shift supervisor in documenting this restriction would more than offset any small safety gain in limiting control board duty. Furthermore, CP&L's normal shift practices effectively limit an operator's time on the control board to eight continuous hours by routine but unscheduled breaks and using an operator who may have been held over beyond eight hours as a relief operator rather than the operator on the control board. Additionally, a rigid policy on control board duty would potentially require more frequent relief of operators during non-steady-state conditions which would not be good operating practice. A final objection is that it would be impossible to avoid situations where an operator scheduled for an eight-hour shift spent six hours or so on the board and then found that he would have to cover for illness or other unexpected problems. This situation would lead to repeated instances of "retroactive noncompliance" unless all operators were limited to only four hours on the board. Therefore, CP&L will continue its policy of limiting overtime such that an individual will not be permitted to work more than 12 hours straight (not including shift turnover time) but will not commit to a rigid limit on control board duty. As mentioned before, however, CP&L's normal practices effectively limit control board time.

NRC Position (2): There should be a break of twelve hours (which can include shift turnover time) between all work periods.

CP&L Response: The limitation that an operator must have at least a 12-hour break between work periods would severely hamper CP&L's ability to relieve operators for training commitments, holidays, vacations, etc. The operators scheduled for relief/retraining work an eight-hour day, Monday through Friday, unless they are needed to relieve an on-shift operator for a holiday, vacation, or retraining commitment that cannot be otherwise scheduled. An operator working relief/retraining on day shift who was scheduled to relieve an operator for the next day's mid-shift will only have eight hours off. Adjusting his schedule so that he would have at least 12 hours off would be difficult and could be detrimental to morale (i.e., he would work from 0400-1200 the day before or would have to work weekends in order to work 40 hours for the pay week). Out of necessity, individuals working a rotating shift schedule plan their leisure time activities far in advance. Having to work a schedule as described above could significantly disrupt an individual's long term personal and/or family plans resulting in low operator

morale. Most operators would prefer to work their normal seven-day shift even if it was for 12 hours a day and then be assured that their scheduled days off would be uninterrupted.

Therefore, CP&L will continue its policy of assuring that an individual will have at least the same number of hours off between work periods as the length of his last work period (not including shift turnover time). CP&L believes this meets the intent of the NRC position without severely limiting our scheduling ability.

NRC Position (3): An individual should not work more than seventy-two hours in a seven-day period.

CP&L Response: In recent months, the various retraining requirements, simulator training requirements, shift staffing requirements, and other commitments have increased faster than our ability to license new operators. Thus during several weeks during the next few months, the available licensed operators may have to work 12 hours a day for a portion of their seven-day shift. This is accomplished by splitting the eight-hour shift without sufficient operators into two, four-hour segments, requiring the operators on the preceding shift to stay over for four hours, and requiring the operators on the following shift to come in four hours early. The necessity for splitting shifts in this manner could violate the limitation that an individual not work more than 72 hours in any seven-day period. This limitation could not be met without a significant disruption of normal schedules, and would require some operators to work during their scheduled days off. Additionally, it would require almost daily schedule modifications which could result in confusion and adversely affect the ability of the operators to make long-term personal plans.

In addition, the engineers that were hired as Shift Technical Advisors (STA) were recruited based on a schedule of 12 hours per day for seven days followed by seven days off. A departure from our commitment to this schedule could lower STA morale and affect our ability to retain the trained STA's.

Therefore, CP&L's policy will continue to be that an individual shall not work more than 84 hours in any seven-day period (not including shift turnover time).

NRC Position (4): An individual should not be required to work more than 14 consecutive days without having two consecutive days off.

CP&L Response: CP&L's present overtime policy incorporates this restriction.

One additional item needs to be addressed. NUREG-0737 states that the overtime restrictions should extend to "the plant staff who performs safety-related functions (e.g. senior reactor operators, reactor operators, health physicists, auxiliary operators, I&C technicians and key maintenance personnel)." CP&L's staffing policy is such that individuals performing the above maintenance functions are not required to work overtime during normal plant operations. However, when equipment fails, selected individuals may have to work long hours for short periods of time (i.e. greater than 12 hours a day for a few days). We have found that it is sometimes more desirable to allow a maintenance crew to work a few additional hours to complete a task rather than attempt to turn the job over to another crew and risk losing information in the turnover. This type of management flexibility could be lost if formal overtime limits were applied to these individuals. In addition, when equipment is returned to service, it is tested for operability by operators who were not involved in the actual maintenance. If the work has been performed incorrectly, it would be identified at that time.

For the above reasons, CP&L believes that our normal facility manning policies meet the intent of the guidance contained in NUREG-0737 for normal operating conditions and that additional formal limits would only create an extreme additional administrative burden without an improvement in safety.

CP&L's overtime policy for licensed operators, STAs and key safety personnel is summarized as follows:

- a. An individual shall not be permitted to work more than 12 hours straight (not including shift turnover time).
- b. An individual will have at least the same number of hours off between work periods as the length of his last work period (not including shift turnover time).
- c. An individual shall not work more than 84 hours in any seven-day period (not including shift turnover time).
- d. An individual shall not work more than 14 consecutive days without having two consecutive days off.

These limitations apply when the Reactor Coolant System is greater than 200°F and when fuel is being moved within the reactor pressure vessel. Deviations from the above limitations must be approved by senior plant management with appropriate documentation of the circumstances requiring the deviation.

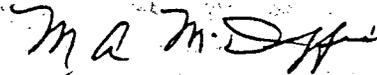
We consider this policy to be in the best interest of the public health and safety, operator morale, and CP&L's operating commitments. We sincerely believe that continuing to follow this policy adequately resolves

Mr. Eisenhut

- 5 -

the concerns expressed in your July 31, 1980 letter and NUREG-0737. If you or your staff would like to discuss this policy further, please contact our staff.

Yours very truly,



for E. E. Utley  
Executive Vice President  
Power Supply and  
Engineering & Construction

JJS/dk N#23

cc: J. N. Hannon (NRC, NRR)  
J. D. Neighbors (NRC, NRR)  
J. P. O'Reilly (NRC, Region II)