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Mr. O'Leary	1			

CLASS: (U) PROP INFO	INPUT	NO CYS REC'D	DOCKET NO:
		1	50-269/270/287 Mine

DESCRIPTION:
Ltr re our 8-15-72 ltr.....furnishing info concerning shift size requirements.....

ENCLOSURES:

ACKNOWLEDGED
DO NOT REMOVE

PLANT NAMES: Oconee Units 1, 2, 3

FOR ACTION/INFORMATION 9-14-72 AB

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Regulatory File

DUKE POWER COMPANY
POWER BUILDING
422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28201

A. C. THIES
SENIOR VICE PRESIDENT
PRODUCTION AND TRANSMISSION

P. O. BOX 2178

September 11, 1972

Mr. John F. O'Leary
Director of Licensing
U. S. Atomic Energy Commission
Washington, D. C. 20545

Re: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Mr. O'Leary:

Please refer to Mr. R. C. DeYoung's letter of August 15, 1972 discussing the minimum shift crew size for Oconee Unit 1, Units 1 and 2, and Units 1, 2, and 3. We wish to state our position that we believe the shift size requirements identified in this letter are unnecessarily large.

We have researched our normal and emergency procedures to determine which of these would be the most demanding on our shift personnel for a particular situation, and it was determined that the loss of control room would require the maximum personnel. On March 12, 1970 in Bethesda, Maryland, on July 15, 1972 in Bethesda, Maryland, and on July 12, 1972 at Oconee Nuclear Station, our operating personnel presented to members of your staff the steps that would be taken by shift members to shut down Oconee Unit 1 and 2 from outside the control room. Our analysis showed that only two operators were required to safely shut down both units and maintain them in a hot shutdown condition from outside the control room. We have proposed five operators per shift for Units 1 and 2.

Our proposed staffing for the Oconee units was based on detailed analysis which was derived from years of fossil experience including our newest supercritical units at Marshall Station which are successfully operated with two men per shift per unit; experience in operating the reactor at Carolinas-Virginia Tube Reactor; and experience in reactor operations at Oak Ridge National Laboratory. Our design of the control boards at Oconee is backed up by 50 man-years of reactor operating experience.

We believe that our proposals of five men per shift for Units 1 and 2 and eight men per shift for Units 1, 2, and 3 represent the optimum shift size designed to employ all shift members in meaningful operations while on duty. Dilution of responsibility with additional manpower can only lead to decreased experience and effectiveness per man and lower morale. The

shift size as stated represents a minimum which would be on duty at all times and allows for no relief personnel. For special operations during the life of the plant and for initial startup of each Oconee unit, we propose to increase the shift size appropriately. These initial startup shift sizes have been previously discussed with your staff and are identified in Section 15, Technical Specifications of the FSAR.

Even though Duke Power Company has presented sufficient justification for our proposed shift staffing and has received no technical objection from the AEC, we are proceeding to train an adequate number of operators for the shift staffing as required by your August 15 letter. Your further review of this matter will be appreciated since we believe that we have demonstrated that the numbers now required by the AEC are unnecessarily large.

Very truly yours,

A. C. Thies

ACT:vr