





## Attachment A

### TECHNICAL SPECIFICATIONS SECTION 6.0, "ADMINISTRATIVE CONTROLS" GONPRAC MEMBERSHIP, OPERATING PERSONNEL WORKING HOURS AND LIMITS, PLANT STAFF QUALIFICATIONS AND TRAINING, AND REPORTS

#### A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to revise Technical Specifications Section 6.0, "Administrative Controls," regarding the General Office Nuclear Plant Review and Audit Committee (GONPRAC) membership, operating personnel working hours and limits, plant staff qualifications and training, and routine and special reports. These proposed changes are discussed below and provided in Attachment B, "Marked Up Technical Specifications".

1. Technical Specification Section 6.2.2, "Plant Staff," is revised to implement a nominal 40-hour work week for operating personnel and limit an individual to work no more than 28 hours in any 48-hour period.
2. Technical Specification Section 6.3, "Plant Staff Qualifications," is revised to change the requirement for plant staff qualification to ANSI/ANS 3.1-1978 and 10 CFR Part 55.
3. Technical Specification Section 6.4, "Training," is revised to change the requirement for the plant staff retraining and replacement training program to 10 CFR Part 55.
4. Technical Specification Section 6.5.2, "General Office Nuclear Plant Review and Audit Committee (GONPRAC)", is changed to add the Plant Manager, Diablo Canyon Power Plant, to the GONPRAC membership and to reflect the current title of the Manager, Station and Hydro Construction.
5. Technical Specification Sections 6.9.1 and 6.9.2 regarding routine reports and special reports are revised to require the submission of reports in accordance with 10 CFR 50.4.

#### B. JUSTIFICATION

##### 1. Plant Staff Working Hours and Limits

The proposed change to Technical Specification 6.2.2.f would eliminate the reference to an 8-hour day, thereby providing a more flexible shift schedule with normal shift durations of up to 12 hours.

The NRC has previously approved the use of routine 12-hour shift operations for other nuclear plants including Oconee, McGuire, Catawba, and Hatch. Each of these 12-hour shift operations has been conducted successfully, resulting in improved operator morale, with no decrease in efficiency and no adverse impact on accident rates.



As indicated in the NRC's safety evaluation which approved the use of 12-hour shift operations at the Hatch Plant<sup>(a)</sup>, a recent study performed for the Department of Energy concluded that the longer 12-hour shift length did not increase either the number or severity of off-normal events at the Fast Flux Test Facility and that the error rate during 12-hour shifts was even lower than it had been on 8-hour shifts. There was an increased productivity of personnel and a decreased attrition rate, resulting in more experienced personnel being on shift.

A draft revised NRC Policy Statement on Working Hour Limits specifically provides for 12-hour shift schedules<sup>(a)</sup>. PG&E's 12-hour shift operations are consistent with the guidelines proposed in the revised Policy Statement for use of 12-hour shifts.

Further, as indicated in the draft revised Policy Statement, the NRC is moving away from prescriptive license requirements to control work hours because reactor operating experience indicates that the length of hours is not associated with safety-related incidents. Rather, the NRC intends to emphasize that it is the licensee's responsibility to set and enforce limits on work hours as necessary to assure safe operations and maintenance.

## 2. Plant Staff Qualifications and Retraining and Replacement Training Program

In PG&E letter to the NRC dated April 30, 1982, and in the DCPD FSAR Update, PG&E committed to comply with the requirements of ANSI/ANS 3.1-1978 within three years of commercial operation. "Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel" (53 FR 46603) stated that the Institute of Nuclear Power Operations (INPO) National Academy for Nuclear Training is generally an effective program for ensuring that nuclear power plant personnel have qualifications commensurate with the performance requirements of their jobs. In addition, 52 FR 9453 dated March 25, 1987 published a revision to 10 CFR Part 55 regarding issuance of operator licenses. The proposed revisions to the plant staff qualification and retraining and replacement training program are consistent with ANSI/ANS 3.1-1978, 10 CFR Part 55, and the NRC policy statement on training and qualification of nuclear power plant personnel. Diablo Canyon has received INPO accreditation for its training and qualification program for licensed operators.

## 3. GONPRAC Membership

The proposed addition of the Plant Manager, Diablo Canyon Power Plant, to GONPRAC will strengthen plant input to GONPRAC for

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(a) NRC letter to Georgia Power Company dated November 24, 1987, Issuance of Amendment Nos. 148 and 85 to DPR-57 and NPF-5, Hatch Nuclear Plant, Units 1 and 2.



increased management oversight of plant activities. This change is consistent with the Standard Technical Specifications, which allow for a minority of the quorum to have line responsibility for plant operation, and is also consistent with the Technical Specifications for several other nuclear plants. The change in title of the Manager, Station Construction, to Manager, Station and Hydro Construction, reflects the change in department names.

#### 4. Routine and Special Reports

10 CFR 50.4 was revised by 51 FR 27817 dated August 4, 1986, to clarify the procedures for submitting correspondence and reports. The proposed Technical Specification changes are consistent with 10 CFR 50.4 requirements and practices at other utilities and will allow PG&E to implement administrative control improvements.

### C. SAFETY EVALUATION

As discussed above, use of a 12-hour shifts for plant staff personnel will not result in a safety concern because of the following:

1. Studies of 12-hour shifts for operations personnel have not indicated any deleterious effects.
2. PG&E's 12-hour shift scheduling is similar to shift rotations now being used successfully at several other nuclear power plants.
3. PG&E's 12-hour shift scheduling is consistent with the draft revised NRC Policy Statement on control of working hours indicating the NRC intent to move away from prescriptive requirements in the Technical Specifications governing work hours.

The other proposed changes will result in improved administrative practices, constitute more restrictive requirements, are consistent with NRC regulations, and do not affect plant operations. Based on these considerations, PG&E believes that there is reasonable assurance that the health and safety of the public will not be adversely affected.

### D. NO SIGNIFICANT HAZARDS EVALUATION

PG&E has evaluated the no significant hazard considerations involved with the proposed amendment focusing on the three standards set forth in 10 CFR 50.92(c) as quoted below:

The Commission may make final determination, pursuant to the procedures in 50.91, that a proposed amendment to an operating license for a facility licensed under 50.21(b) or 50.22 or for a testing facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or



- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The following evaluation is provided for the three categories of the no significant hazards consideration standards.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

Use of a 12-hour shift for plant staff personnel will not result in an increase in the probability or consequences of an accident because: studies of 12-hour shift operations have not indicated any deleterious effects; PG&E's 12-hour shift scheduling is similar to shift rotations now being used successfully at several other nuclear power plants; and PG&E's 12-hour shift scheduling is consistent with the draft revised NRC Policy Statement on control of working hours, indicating the the NRC intent to move away from prescriptive requirements in the Technical Specifications governing work hours.

The other proposed changes will result in improved administrative practices, constitute more restrictive requirements, are consistent with NRC regulations, and do not affect plant operations.

Based on these considerations, these changes will not increase the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because there is no physical alteration to any plant system, nor is there a change in the method in which any safety related system performs its function. The proposed changes are administrative in nature and, therefore, do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the change involve a significant reduction in the margin of safety?

The proposed changes are administrative in nature and, therefore, will not reduce any margin of safety.

#### E. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

In conclusion, based on the above evaluation, PG&E submits that the activities associated with the LAR satisfy the no significant hazards consideration standards of 10 CFR 50.92(c) and, accordingly, a no significant hazards consideration finding is justified.



F. ENVIRONMENTAL EVALUATION

PG&E has evaluated the proposed changes and determined that the changes do not involve (i) significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed changes is not required.



ATTACHMENT B  
MARKED-UP TECHNICAL SPECIFICATIONS

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