



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SHIFT STAFFING

NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT NUCLEAR STATION, UNIT NO. 1

DOCKET NO. 50-220

1.0 Introduction

A change to 10 CFR Part 50, Section 50.54, issued on July 11, 1983, requires that, effective January 1, 1984, a senior reactor operator (SRO) be present at all times in the control room from which a nuclear power unit is being operated. The requirement for this SRO in the control room is in addition to the previously established requirement (via plant technical specifications) that an individual holding an SRO license for all fueled units at a site, and who is assigned responsibility for overall plant operation, be present at the site at all times there is fuel in any unit. The new rule, in Section 50.54(m), codifies the requirement for both of these SROs.

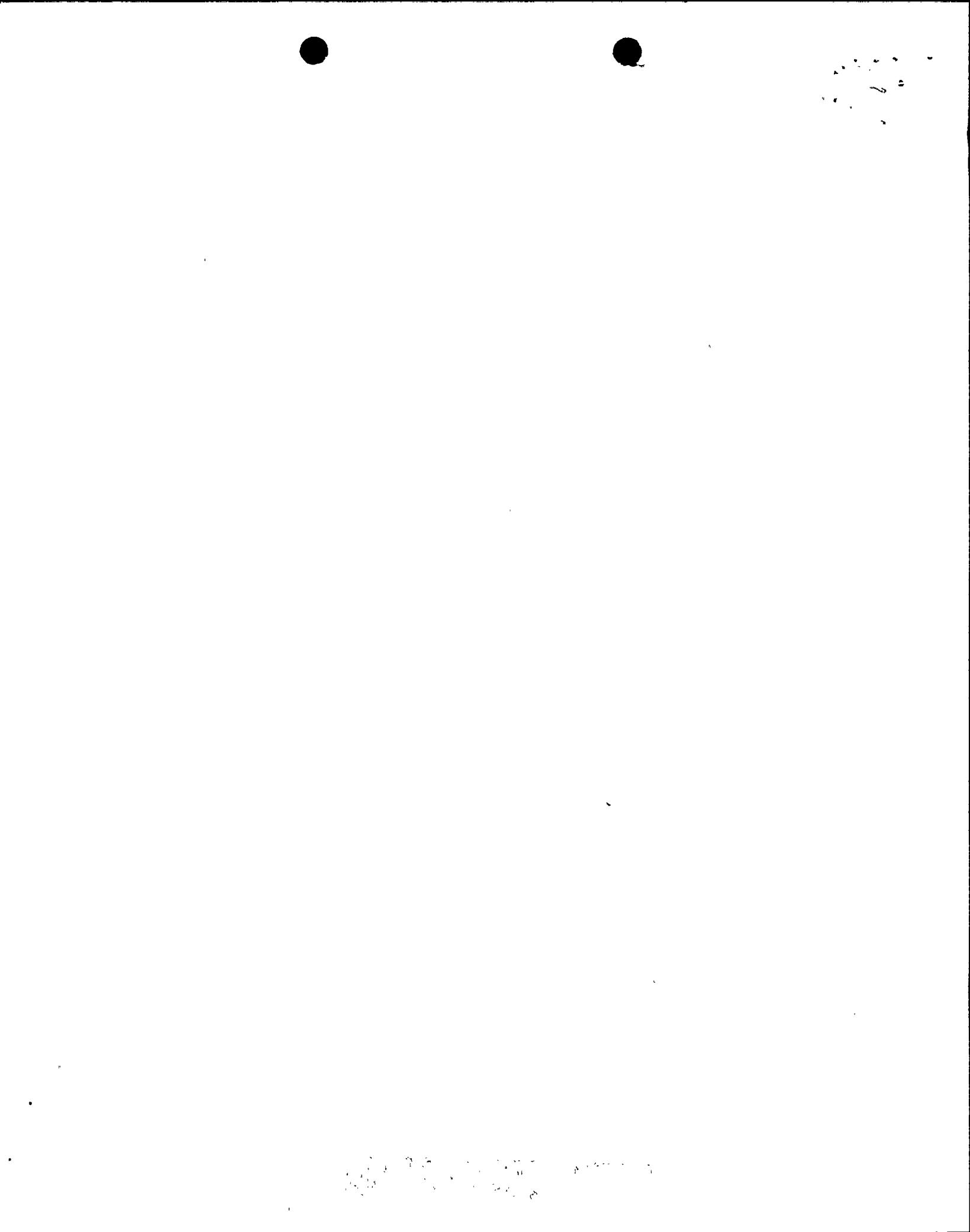
A Federal Register Notice published on July 25, 1983, advised that the Commission had under consideration a draft Policy Statement that would allow licensees to combine the function of the Shift Technical Advisor (STA) with the function of an SRO, provided certain conditions are met.

2.0 Evaluation

By letter dated October 6, 1983, the Niagara Mohawk Power Corporation (the licensee) informed the NRC that it intended to meet the requirement for the second SRO at Nine Mile Point Unit 1 by using an SRO licensed STA in a dual role, in accordance with the draft policy guidance. The licensee previously, by letter dated March 3, 1981, had committed to provide a second SRO on shift by using the STA in a dual role. All STAs at Nine Mile Point Unit 1 are degreed engineers who have received specific training as required for performance of STA duties. Hence, they meet the qualification requirements for dual role use as set forth in the draft Policy Statement. Using this dual role approach, the licensee has been in compliance with the additional SRO staffing requirement since July 1982.

At this time, the policy on use of a dual role STA-SRO is still not final. A final decision on this matter will not be made until after the January 1, 1984 effective date for the second SRO to be on shift. If the draft Policy Statement is ultimately approved in approximately its present form, the licensee will be in full compliance with the

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staffing requirement. However, should the draft Policy Statement not be approved, the licensee would be placed in a position where the operating shifts at Nine Mile Point Unit 1 would be short either one SRO or the STA, since the existing dually-qualified individuals could be counted as either an SRO or an STA, but not both. The licensee's letter of October 6, 1983, requested that, in the event the draft Policy Statement is not approved, an extension of two years be granted to allow time for the licensee to train and license the additional SROs that would be required.

While not suggested by the licensee, we consider, that, in the event the Policy Statement is not approved, the existing dually-qualified individuals should be counted as SROs, thereby allowing the licensee to be in compliance with the staffing rule. An exemption to the STA requirements might be required in such a case, but additional STAs probably could be hired and trained in less than two years.

We have reviewed the licensee's commitment and we conclude that the licensee has made a good faith effort to comply with the requirement for SRO staffing. In fact, Nine Mile Point Unit 1 was provided with an additional SRO on each shift for a full one and one-half years prior to the requirement established by the NRC. In the event that the draft Policy Statement ultimately is disapproved, a considerable period of time would be required for the licensee to hire and train new STAs. While the actual time required is uncertain, what is needed now is a commitment that we will consider an exemption as may be necessary should the Policy Statement be disapproved.

3.0 Conclusion

We conclude that the licensee is now in compliance with the change to 10 CFR Part 50.54 by using the provisions of the draft Policy Statement so an extension at the present time is unnecessary. We further conclude that if the draft Policy Statement is not approved, the licensee should be granted an extension or exemption as may be required to allow time to train new STAs.

