NIAGARA MOHAWK POWER CORPORATION NINE MILE POINT NUCLEAR STATION ADMINISTRATIVE PROCEDURE

AP-4.3

REVISION 01

CONTROL OF WORKING HOURS

TECHNICAL SPECIFICATION REQUIRED

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THIS IS A FULL REVISION

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1.0 PURPOSE

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To establish administrative controls necessary for the implementation of technical specification requirements on individual working hours.

1.1 Applicability

(COMM 2)

This procedure applies to personnel who perform or direct safety-related functions, specifically:

- 1.1.1 Licensed senior reactor operators and reactor operators
- 1.1.2 Nonlicensed operators
- 1.1.3 Chemistry, Radiation Protection, and Reactor Analyst technicians
- 1.1.4 Maintenance personnel
- 1.1.5 Personnel who perform inspections, examinations, and tests on safety-related systems, structures or components

2.0 PRIMARY RESPONSIBILITIES

- 2.1 The <u>Plant Manager</u> is responsible for overall administrative control for the use of overtime and deviation authorizations from Technical Specification overtime guidelines.
- 2.2 <u>Branch Managers</u> are responsible to ensure assigned personnel adhere to working hour guidelines and approve deviations.

3.0 PROCEDURE

3.1 General Requirements

- 3.1.1 Branch Managers should ensure adequate shift coverage is maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week during routine operations.
- 3.1.2 The use of overtime should be limited to circumstances where essential work must be done on an accelerated schedule and, except during extended shutdown periods, should be considered on an individual basis and not for the entire staff on a shift. The following criteria should be used:
 - To complete work on a problem immediately affecting nuclear or industrial safety.
 - b. To complete work affecting critical path during a shutdown.

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3.1.2 (Cont)

- c. To respond to a Limiting Condition for Operation (LCO) Action requirement during any mode switch position.
- d. To complete a procedure where it is safer to complete than secure.
- 3.1.3 Except for unusual and unanticipated circumstances, overtime should be planned in advance:
- 3.1.4 All paid overtime should be approved by authorized supervision before the overtime is worked.

3.2 <u>Individual Overtime Guidelines</u>

- 3.2.1 Individuals identified in Section 1.1 should not be permitted to work, excluding shift turnover time and nonworking lunch breaks, more than:
 - a. 16 hours straight
 - b. 16 hours in any 24 hour period
 - c. 24 hours in any 48 hour period
 - d. 72 hours in any 7 day period

NOTE: The above periods are consecutive rolling periods and are not based on calendar work weeks.

3.2.2 Individuals subject the requirements of Section 3.2.1 should have at least an 8 hour break (which may include shift turnover time) between work periods.

3.3 Overtime Deviation Requests

- 3.3.1 Deviations from the Individual Overtime Guidelines (Section 3.2) should not occur except in the event of unforseen circumstances which can not be avoided.
- 3.3.2 Before deviation from Individual Overtime Guidelines occurs, Department Supervision shall:
 - a. Initiate an Overtime Deviation Request (Attachment 1) and forward to the Branch Manager.

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3.3.2 (Cont)

b. If unable to obtain prior written authorization, obtain verbal approval from the Plant Manager and process the request as soon as practicable.

NOTE: Deviations from overtime restrictions normally authorized by the Plant Manager may also be authorized by higher levels of Management.

- 3.3.3 Branch Managers shall evaluate Overtime Deviation Requests prior to deviation.
 - a. If approval is recommended, sign and date the request and forward to the Plant Manager for approval.
 - b. If disapproved, recommend alternative action with initiating Department Supervision.
- 3.3.4 The Plant Manager shall evaluate Overtime Deviation Requests.
 - a. If approved, sign, date and return to initiating Department Supervision.
 - If disapproved, recommend alternate action and return a copy of the deviation request to initiating Department Supervision.

3.4 Monthly Review of Overtime Deviations

- 3.4.1 The Plant Manager shall ensure a summary of approved overtime deviations is submitted monthly to the Vice President, Nuclear Generation.
- 3.4.2 The Vice President, Nuclear Generation shall ensure individual overtime is reviewed monthly to assure excessive hours have not been assigned.

4.0 **DEFINITIONS**

None

5.0 REFERENCES AND COMMITMENTS

5.1 <u>Licensee Documentation</u>

- 5.1.1 Unit 1 Technical Specifications, Section 6.2.2, Facility Staff
- 5.1.2 Unit 2 Technical Specifications, Section 6.2.2, Unit Staff

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5.2 <u>Standards, Regulations, and Codes</u>

ANSI/ANS-3.2-1982, Administrative Controls and Quality Assurance for the Operation Phase of Nuclear Power Plants, Section 5.2.1.6, Human Factors Considerations

5.3 Policies, Programs, and Procedures

- 5.3.1 NDD-FFD, Fitness For Duty
- 5.3.2 AP-10.1, Management of Station Records

5.4 <u>Commitments</u>

	Sequence <u>Number</u>	Commitment <u>Number</u>	Description
-	1	NCTS 503524-10	NMPC will review all departments' methods of overtime control and tracking.
	2	DER C-91-Q-0464	Ensure overtime controls are applicable to personnel who perform safety-related functions (including contractors) as expressed in NRC Information Notice 91-36.

6.0 RECORD REVIEW AND DISPOSITION

The following records are retained in accordance with AP-10.1, Management of Station Records:

Approved Overtime Deviation Requests

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ATTACHMENT 1 OVERTIME DEVIATION REQUEST

OVERTIME DEVIATION REQUEST (AP-4.3-F1-01)

Type of Overtime Deviation			
1. More than 16 consecutive hours	4. More than 7	2 hours in a 7 day period	-
2. More than 16 hours in any 24 hour period	5. Less tharra	n 8 hour break between w	rork periods
3. More than 24 hours in a 48 hour period			
N	Type of Overtime		od of Deviation
Name of Personnel	Deviation (1-5)	From (Date/Time)	To (Date/Time)
	P		
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Reason for Deviation			
0			
Department Supervisor Recommendation			Date
Branch Manager Recommendation			Date
lote: Ensure overtime deviation is approved by the Plant Manager before scheduling	the overtime.		
Alternate Action Ordered			
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Plant Manager Approval			
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Retain approved Overtime Deviation Requests in accordance with AP-10.1.

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