

AUG 1 1979

The Honorable Richard Stone
United States Senator
Post Office Box 4081
Tallahassee, Florida 32303

Dear Senator Stone:

Thank you for your letter of June 21, 1979, regarding the number of hours that licensed operators are required to work at the St. Lucie Nuclear Power Facility. To the extent that routinely required overtime work may affect the ability of an operator to perform his duties or affect his satisfaction on the job, the Nuclear Regulatory Commission (NRC) is concerned with the potential impact of this matter on safe operation of licensed facilities. Accordingly, we have investigated the allegations made by licensed reactor operators at the St. Lucie facility that they are routinely required to work up to 16 continuous hours. The investigation included interviews with ten (10) licensed operators and four (4) unlicensed (auxiliary) operators and a review of time records for the period January 1, 1979 to June 30, 1979, for thirteen (13) licensed operators.

The results of this investigation revealed that licensed operators are required to work a normal 8-hour shift during routine operation and that 12-hour shifts are scheduled for planned outages. However, for special situations such as an operator on the next shift calling in sick and no other off-shift personnel available, the operator on duty with the least seniority is required to work 4 hours extra to complete a 12-hour shift, and an operator on a later shift is supposed to be called in 4 hours early. It appears that the off-duty operators do not normally answer their telephones; therefore, the on-duty operator has to work the full 16-hour period. The union contract between the Florida Power and Light Company and the International Brotherhood of Electrical Workers Union states that no employee shall be required to work more than 16 hours without immediately thereafter having 7.5 hours off-duty.

The records review indicates that sick calls occurred approximately once every two weeks with an occasional once per week frequency. Our inspector noted that these 16-hour shifts occur more frequently after extended outages. There was one instance where an operator worked back-to-back shifts; i.e., one shift off between two 16-hour working shifts and another instance where two operators on the same shift worked 16 hours each. During discussions, the operators stated that following extended outages, plant personnel call in sick to have some time off because they are tired of the long hours (12-hour shifts). Consequently, the on-duty operator ends up working a 16-hour shift.

The Nuclear Regulatory Commission does not set limits on the consecutive hours operators may be on duty. However, as part of the Operating License Review, our Office of Nuclear Reactor Regulation assures that in excess of four full operating shift crews are planned so that excessive overtime will not be

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routinely scheduled for these crews. These plans are incorporated in Technical Specification requirements as part of the facility license. Our inspectors routinely verify that the licensee is in conformance with these requirements.

While our investigation indicates that further action by the NRC is not warranted at St. Lucie, we are taking a further look, based on information discussed in the St. Lucie operators' letter of May 11, 1979, at the safety-related aspect of working extended hours to ascertain whether NRC action is required to limit the working hours of operators. We would not hesitate to take appropriate action should instances come to our attention where operators' ability to perform their duties was impaired.

Sincerely,


~~Original signed by Lee V. Gossick~~

Lee V. Gossick
Executive Director for Operations