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Attachment 3  
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**ATTACHMENT 3**

**Proposed Changes - Technical Specification 6.2.2.f.**

- St. Lucie Unit 1 Technical Specification page 6-5
- St. Lucie Unit 2 Technical Specification page 6-2

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6.0 ADMINISTRATIVE CONTROLS

- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel.

The administrative procedures shall include guidelines on working hours that ensure that

Adequate shift coverage shall be maintained without routine heavy use of overtime. <sup>for individuals</sup> The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modification, on a temporary basis the following guidelines shall be followed:

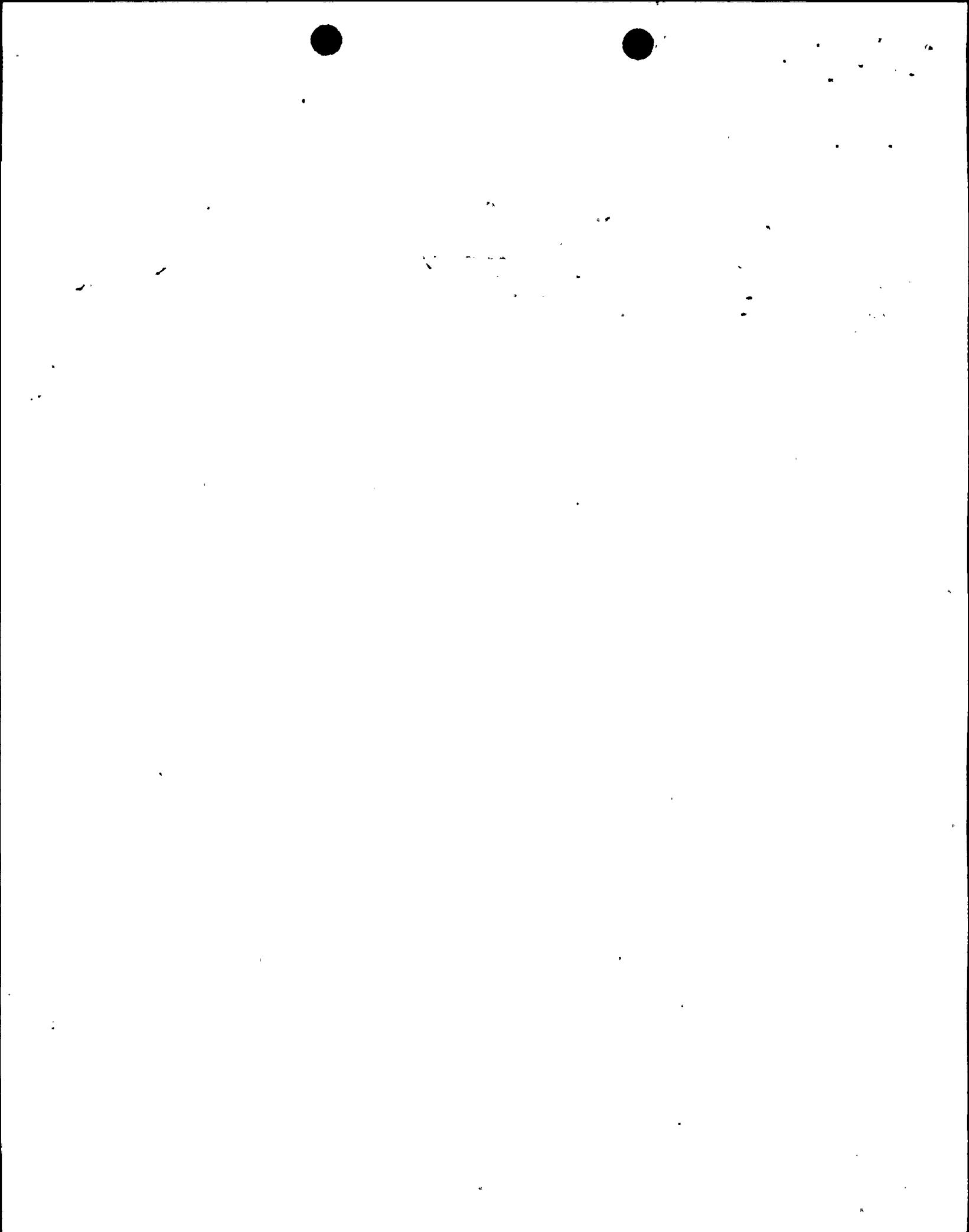
1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant General Manager or his deputy, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant General Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

- g. The Operations Supervisor shall hold a Senior Reactor Operator license.

SHIFT TECHNICAL ADVISOR

6.2.3 The Shift Technical Advisor function is to provide on shift advisory technical support in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit.



6.2 ORGANIZATION (Continued)

UNIT STAFF

6.2.2 The unit organization shall be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the reactor is in MODE 1, 2, 3, or 4, at least one licensed Senior Reactor Operator shall be in the control room.
- c. A health physics technician<sup>#</sup> shall be on site when fuel is in the reactor.
- d. Either a licensed SRO or licensed SRO limited to fuel handling who has no concurrent responsibilities during this operation shall be present during fuel handling and shall directly supervise all CORE ALTERATIONS.

e. DELETED

f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions, e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel. Adequate shift coverage shall be maintained without routine heavy use of overtime. ~~The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating.~~ However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modification, on a temporary basis the following guidelines shall be followed:

The administrative procedures shall include guidelines on working hours that ensure that

for individuals.

# The health physics technician may be less than the minimum requirement for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

