



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 127 TO FACILITY OPERATING LICENSE NO. DPR-33
AMENDMENT NO. 122 TO FACILITY OPERATING LICENSE NO. DPR-52
AMENDMENT NO. 98 TO FACILITY OPERATING LICENSE-NO. DPR-68
TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2 AND 3
DOCKET NOS. 50-259, 50-260 AND 50-296

1.0 INTRODUCTION

By letter dated November 5, 1985 (TVA BFNP TS-214), the Tennessee Valley Authority (the licensee or TVA) requested amendments to Facility Operating License Nos. DPR-33, DPR-52 and DPR-68 for the Browns Ferry Nuclear Plant, Units 1, 2 and 3. The proposed amendments would change the Technical Specifications to add a requirement that detailed written plant procedures be prepared, approved, and adhered to, limiting the amount of overtime worked by individuals performing safety-related functions. The November 5, 1985 submittal made minor changes in the wording of an earlier December 21, 1984 (TS-206) submittal to clarify that the procedures will be in accordance with the Commission's policy on overtime but did not depart from the proposed amendment as described in the notice published on February 27, 1985 (50 FR 8009).

2.0 EVALUATION

IE Circular No. 80-02, "Nuclear Power Plant Staff Work Hours," dated February 1, 1980 provided guidance concerning overtime work by plant staff who perform safety-related functions. The guidance contained in the Circular was amended by a letter dated July 31, 1980. In turn, the guidance of the July 31, 1980 letter was revised by Item I.A.1.3 of NUREG-0737. The Commission issued a policy statement on Nuclear Power Plant Staff Working Hours through Generic Letter No. 82-12 (June 15, 1982) which further revised the overtime guidance. This guidance is as follows:

Enough plant operating personnel should be employed to maintain adequate shift coverage without routine heavy use of overtime. The objective is 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 modifications, on a temporary basis, the following guidelines are provided:

- a. An individual should not be permitted to work more than 16 hours straight (excluding shift turnover time).

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

Recognizing that very unusual circumstances may arise requiring deviation from the above guidelines, such deviation shall be authorized by the plant manager or his deputy, or higher level of management. The paramount consideration in such authorizations shall be that significant reductions in the effectiveness of operating personnel would be highly unlikely. Authorized deviations to the working hour guidelines shall be documented and available for NRC review. In addition, procedures are encouraged that would allow licensed operators at the controls to be periodically relieved to perform other duties away from the control board during their shift.

Generic Letters No. 82-12 and 83-02 requested licensees to initiate action to revise technical specifications to assure that plant procedures are consistent with the above policy. Generic Letter 83-14 clarified the guidance of Generic Letter 82-12 to define the term "key maintenance personnel." The licensee's proposed amendment would require plant procedures in accordance with the NRC policy statement on working hours as provided in Generic Letter No. 82-12. We find this acceptable.

3.0 ENVIRONMENTAL CONSIDERATIONS

This amendment relates to changes in administrative procedures or requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10) and pursuant to 10 CFR 51.22(b) no environmental impact statement or assessment need to be prepared in connection with the issuance of this amendment.

4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: W. Long

Dated: February 26, 1986



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