



South Texas Project Electric Generating Station P.O. Box 289 Wardworth, Texas 77483

May 21, 2018
NOC-AE-18003574
10 CFR 55.11
10 CFR 55.47
10 CFR 55.31

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498 and STN 50-499
Response to Request for Additional Information Regarding
Request for Exemption from 10 CFR 55.47

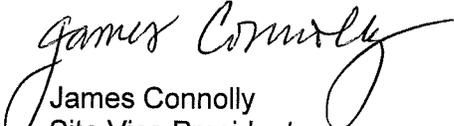
References:

1. Letter from J. Connolly to NRC Region IV Regional Administrator, "Request for Waiver of Exam and Testing Requirements and Request for Exemption from 10 CFR 55.47 Waiver of Examination and Test Requirements," dated March 8, 2018, NOC-AE-18003554 (ML18129A131)
2. Email from L. Regner to L. Sterling, "Draft STP Exemption RAI", dated May 9, 2018 (L-2018-LLE-0005)

By Reference 1, STP Nuclear Operating Company (STPNOC) submitted a Request for Exemption from 10 CFR 55.47 and Request for a Waiver of Exam and Testing Requirements. In Reference 2, the NRC requested additional information for the review of the Exemption Request. The purpose of this letter is to provide a response to the request for additional information.

There are no commitments in this letter.

If there are any questions regarding this information please contact Robyn Savage at 361-972-7438 or David Breland at 361-972-7617.


James Connolly
Site Vice President

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Attachment: Response to Request for Additional Information Related to Exemption Request from 10 CFR 55.47

STI 34669631

cc:
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**Response to Request for Additional Information
Related to Exemption Request from 10 CFR 55.47**

NRC RAI-1

1. Basis: 10 CFR Part 55.11 states, in part,

The Commission may... grant such exemptions from the requirements of the regulations in this part as it determines are authorized by law and will not endanger life or property and are otherwise in the public interest.

Concern: The exemption request states that it is needed to increase staffing of licensed reactor operators due to increased attrition over several years, and that this will ease licensed operator overtime and provide watch rotation flexibility. The exemption does not provide specifics on how this exemption is in the public interest related to this overtime and increased attrition, such as the specific impact(s) of current licensed operator overtime on the facility operation and the time period and details of the increased operator attrition.

Request:

- a) Provide the current, specific impacts of licensed operator overtime (for example, performance issues, number of waivers from Part 26 fitness for duty requirements, etc.) that warrant this exemption as being in the public interest.
- b) Provide details on the increase in operator attrition and the time period that this attrition has occurred.

STPNOC Response:

Reactor Operator (RO) staffing was optimal in January 2016 at 30 operators. Since then attrition has continued with 25 ROs on staff in July 2016, 26 ROs in January 2017, 21 ROs in January 2018, and 19 ROs currently on staff. Work hours have been closely managed to avoid waivers from the 10 CFR 26 work hour requirements to date, however, the situation affects the operator's quality of life. RO's are working an average of 47 shifts (12.5 hour/shift) of overtime each month to cover the required Control Room watch. Only a limited number of Senior Reactor Operators (7) are permitted to operate the controls due to union requirements and negotiations, for a total of 26 operators to fulfill the overtime needs on a monthly basis. This does not include the 5 to 15 additional overtime slots necessary to cover sick time, death in the family, jury duty, or to support for licensed operator exam validations. Going forward, the use of currently licensed reactor operators for exam validations will have to be discontinued to support staffing needs.

There is also concern that the chronic overtime will result in an increase in the operator attrition. While no performance issues have been directly attributed to operator overtime, it has stressed the organization. The exemption is in the public interest to help alleviate overtime demands. As noted in our request for the exemption, details were provided demonstrating Mr. Denton is fully capable and qualified to operate the controls as a Reactor Operator.

NRC RAI-2

2. Basis: same as previous.

Concern: In the exemption request, the licensee states that the individual would be unable to take a license examination until July 2019 and therefore, the exemption request is in the public interest due to the amount of time before the individual could take an examination. There is, however, an initial licensed operator examination scheduled starting October 22, 2018.

Request: Explain why the October 22, 2018, initial license operator examination date is not being considered for this individual.

STPNOC Response:

STPNOC licensed operator training (LOT) procedures establish a training program using a systematic approach to training in accordance with 10 CFR 55. The procedure guidance requires the development of a training schedule and exam progression that prepare the candidates for the NRC exam. LOT 22 classes started in January 2017. The licensed operator candidate is required to start no later than the beginning of the systems phase training. Mr. Denton would have been required to start the licensed operator training class (LOT 22) no later than June 19, 2017 for an October 2018 NRC exam date.

Mr. Denton did not return to STP until August 21, 2017 and did not complete the training to reinstate his RO license he had missed during his absence until March 2018. Therefore, Mr. Denton's first available class for which he could complete the required training (LOT 23) has a July 2019 exam date.