

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
THE HARTFORD ELECTRIC LIGHT COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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October 22, 1980

Docket Nos. 50-213  
50-245  
50-336  
50-423  
A01194

Darrell G. Eisenhut, Acting Director  
Division of Operating Reactors  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

- References:
- (1) D. G. Eisenhut letter to all Licensees of Operating Plants and Applicants for Operating Licenses and Holders for Construction Permits dated July 31, 1980.
  - (2) H. R. Denton letter to all Power Reactors Applicants and Licensees dated March 28, 1980.
  - (3) D. G. Eisenhut letter to all Licensees of Operating Plants and Applicants for Operating Licenses and Holders of Construction Permits dated September 5, 1980.
  - (4) W. G. Council letter to D. G. Eisenhut dated October 1, 1980.
  - (5) W. G. Council letter to P. F. Collins dated October 21, 1980.

Gentlemen:

Haddam Neck Plant  
Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3  
Interim Criteria for Shift Staffing

In Reference (1) the NRC staff provided interim requirements for shift manning and requested that present staffing criteria be reviewed against the proposed requirements and that steps be taken to comply with the requested staffing criteria as soon as practical.

Northeast Nuclear Energy Company and Connecticut Yankee Atomic Power Company have already made plans to increase the shift staffing requirements to comply with the intent of staff requirements for additional licensed personnel.

Specifically, Connecticut Yankee Atomic Power Company and Northeast Nuclear Energy Company intend to upgrade shift staffing such that each unit will have two licensed Senior Reactor Operators, two licensed Reactor Operators, and a minimum of two unlicensed auxiliary operators, any time a unit is being operated. Shift manning requirements for other modes shall also meet the requirements specified in Reference (1).

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It is our intention to increase shift manning in conjunction with our overall program for shift upgrading and training. This program is designed to increase our overall operations staff to allow for increased turnover, reduce overtime workload, and provide for normal shift rotations while meeting the many new operator training requirements. This program will also provide training to selected operators thereby fulfilling the INPO final STA training requirements as discussed in Item I.A.1.1 of Reference (3). Our present program schedule results in compliance with the July 1, 1982 new shift staffing deadline. However, meeting the above deadline is contingent upon the following assumptions:

- a. Minimum turnover of personnel out of the Operations Department and continued success at licensing new Reactor Operators and Senior Reactor Operators.
- b. Meeting our ambitious hiring objective in a timely manner which will allow enrolling a maximum number of personnel into our reactor operator license schools. They will subsequently be available to relieve other Reactor Operators who will be trained as Senior Reactor Operators or Shift Technical Advisors.
- c. Crediting the on-shift time of licensed operators fulfilling the duties of the reactor operator towards meeting the three month shift training experience requirements for Senior Reactor Operator candidates as required in Reference (2). This concept was first identified by the Staff in Reference (4) and formally requested in Reference (5).

Invalidation of any of the above assumptions could result in a situation which may delay implementation of our overall operator upgrade program. Continuation of the program under such situations could result in a significant reduction in the overall experience level of one or more of our operating shifts. We intend to maintain an adequate shift experience level throughout this transition in staffing requirements thereby satisfying our commitment to maintain safe operation and protect the health and safety of the public.

Considering the above circumstances, it is our intention to comply with the Staff's staffing requirements by July 1, 1982, although circumstances beyond our control may preclude achieving this goal. We will keep you informed of our progress and notify you of any schedule changes. Further clarification of our final STA program will be provided by January 1, 1981 as requested in Reference (3).

Regarding our comments on your Adjunct Shift Staffing Requirements and your Licensed Operator Overtime Policy, Attachment #1 and Attachment #2 provide comments in those areas respectively.

Your staffing requirements and administrative control requirements on staffing for Millstone Unit #3 will be factored into our overall training and staffing plans.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council  
Senior Vice President

Attachment #1

Adjunct requirements to the shift staffing criteria stated in Reference (1):

Requirement

- a. A shift supervisor with a senior reactor operator's license who is also a member of the station supervisory staff, shall be on site at all times when at least one unit is loaded with fuel.

Response

Present Technical Specifications for each unit already contain this requirement.

Requirement

- b. A licensed senior reactor operator (SRO) shall, at all times, be in the control room from which a reactor is being operated. The shift supervisor may from time-to-time act as relief operator for the licensed senior reactor operator assigned to the control room.

Response

We will be unable to meet this requirement until our operations staff has been upgraded. During the implementation phase of our staffing upgrade there will be circumstances where some shifts may only have one senior licensed operator. At the time that our staff is upgraded to include two SRO's, we will comply with this requirement.

Requirement

- c. For any station with more than one reactor containing fuel, the number of licensed senior reactor operators on site shall, at all times, be at least one more than the number of control rooms from which the reactors are being operated.

Response

Each of our operating units is staffed like a single unit site, therefore we will provide additional senior licenses as indicated above.

Requirement

- d. In addition to the licensed senior reactor operators specified in a., b., and c. above, for each reactor containing fuel, a licensed reactor operator (RO) shall be in the control room at all times.

Response

Our present Technical Specification already contain this requirement.

Requirement

- e. In addition to the operators specified in a., b., c., and d. above, the unit must have from either a separate or shared control room, an additional licensed reactor operator (RO) shall be onsite at all times and available to serve as relief operator for that control room. As noted above, this individual may serve as relief operator for each unit being operated from that control room, provided he holds a current license for each unit.

Response

Our technical specifications already require two licensed reactor operators onsite when the reactor is being operated.

Requirement

- f. Auxiliary (non-licensed) operators shall be properly qualified to support the unit to which assigned.

Response

Procedures and training programs have been implemented to provide training of auxiliary operators on the unit to which they are assigned.

Requirement

- g. In addition to the staffing requirements stated above, shift crew assignments during periods of core alterations shall include a licensed senior reactor operator (SRO) to directly supervise the core alterations. This licensed senior reactor operator may have fuel handling duties but shall not have other concurrent operational duties.

Response

The requirement is already included in Technical Specifications.

POOR ORIGINAL

Attachment #2

Additional administrative controls regarding shift staffing and overtime policy as stated in Reference (1):

Requirement

In addition, licensees of operating plants and applicants for operating licenses shall include in their administrative procedures (required by license conditions) provisions governing required shift staffing and movement of key individuals about the plant. These provisions are required to assure that qualified plant personnel to man the operational shifts are readily available in the event of an abnormal or emergency situation.

Response

These requirements will be incorporated into our administrative procedures by October 29, 1980.

Requirement

- (1) An individual shall not be permitted to work more than 12 hours straight (not including shift turnover time).

Response

This requirement will be incorporated into our administrative procedures by October 29, 1980.

Requirement

- (2) An individual shall not be permitted to work more than 24 hours in any 48 hour period.

Response

This requirement will be incorporated into our administrative procedures by October 29, 1980, with the clarification that the 24 hours does not include the shift turnover time.

Requirement

- (3) An individual shall not work more than 72 hours in any 7 day period.

Response

This requirement will be incorporated into our administrative procedures by October 29, 1980.

Requirement

- (4) An individual shall not work more than 14 consecutive days without having two consecutive days off.

Response

This requirement will be incorporated into our administrative procedures, with the exception that during three shift operation periods such as refueling outages, 44 consecutive hours off will be provided in lieu of the two consecutive day off requirement.

Requirement

However, recognizing that circumstances may arise requiring deviation from the above restrictions, such deviation may be authorized by the plant manager or higher levels of management in accordance with published procedures and with appropriate documentation of the cause.

Response

We share your recognition that administrative controls need to be established for deviations from the above restriction. However, we are establishing a hierarchical approval system depending on the degree of exception. For deviations of only one day, the Shift Supervisor or higher Supervision shall be authorized to grant exceptions. For deviations greater than one but no more than 3 days, the Department Head or higher supervisor will be authorized to grant the exceptions. For waivers greater than three days, the Plant Manager (Station Superintendent) shall authorize.

We feel the above controls are an acceptable alternative while still meeting the intent of the requirement.