



## Omaha Public Power District

1623 HARNEY • OMAHA, NEBRASKA 68102 • TELEPHONE 536-4000 AREA CODE 402

October 30, 1980

Director of Nuclear Reactor Regulation  
ATTN: Mr. Robert A. Clark, Chief  
Operating Reactors Branch No. 3  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Reference: Docket No. 50-285

Gentlemen:

Omaha Public Power District received the Commission's letter dated July 31, 1980, regarding interim criteria for shift manning. The District has initiated administrative procedures to ensure compliance with the Commission's criteria for overtime regarding Senior Reactor Operators, Reactor Operators, and Shift Technical Advisors. In response to the general staffing criteria, the District's position is attached. The District supports the Commission's position on the importance of maintaining adequate operating personnel, and we believe the attached information adequately meets the Commission's criteria.

Sincerely,

W. C. Jones  
Division Manager  
Production Operations

WCJ/KJM/TLP:jmm

Attachment

cc: LeBoeuf, Lamb, Leiby & MacRae  
1333 New Hampshire Avenue, N. W.  
Washington, D. C. 20036

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Attachment

FORT CALHOUN STATION'S PROGRAM  
FOR UPGRADING SHIFT MANNING

Currently, shift manning requirements for the Fort Calhoun Station during operating or hot shutdown modes are as follows:

- 1 Shift Supervisor (SRO)
- 1 Reactor Operator (RO)
- 1 Assistant Reactor Operator (RO)
- 2 Equipment Operators-Nuclear
- 1 Auxiliary Operator-Nuclear

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- 6 Total

These shift personnel rotate on a six section shift work rotation so as to provide relief personnel for scheduled and unscheduled absences and to provide adequate time for training and retraining requirements. In addition to these shift personnel are the Shift Technical Advisor, the Shift Health Physicist, and additional shift guard personnel who are qualified fire brigade members. This manning exceeds that currently required by the plant's license for operating and hot shutdown modes, which is:

- 1 Shift Supervisor (SRO)
- 2 Operator Licensed Personnel (RO)
- 2 Non-Licensed Personnel

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- 5 Total

The interim criteria for shift staffing outlined in the Commission's July 31, 1980, letter for operating and hot shutdown modes is as follows:

- 1 Shift Supervisor (SRO)
- 1 Senior Reactor Operator (SRO)
- 2 Reactor Operators (RO)
- 2 Non-Licensed Personnel

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- 6 Total

As can be seen, the Fort Calhoun Station normally during operating and hot shutdown modes has a sufficient number of personnel to meet this new requirement on each shift and still maintain the six section shift work rotation desired by management for training and retraining and for relief personnel. Six shifts of personnel have also allowed for compliance with IE Circular 80-02 (limitations on overtime). Deviations from this circular have been rare (primarily during refueling outages) and deviations are documented, justified, and authorized by management as allowed by the circular.

The District concurs with the Commission's concern that a Senior Reactor Operator be present in the control room at all times the plant is in operating or hot shutdown modes. Accordingly, the District will initiate a program, as described below, to ensure that two qualified Senior Reactor Operators will be onsite at all times (Shift Supervisor and an additional Senior Reactor Operator). However, the District takes exception to the requirement for two licensed Reactor Operators onsite.

The District believes that the Shift Supervisor, as a qualified Senior Reactor Operator, could relieve either the Senior Reactor Operator or Reactor Operator for a short period of time to ensure two qualified personnel are in the control room under all circumstances. The District's experience has been such that we have never violated the existing manning requirements. Additionally, the District has always maintained a pool of additional licensed operators above the minimum requirements to provide a cushion for attrition due to job changes or sickness. The requirement to have two Senior Reactor Operators and two Reactor Operators would burden the plant's training programs and deplete our pool of qualified personnel such that we could not readily respond to personnel losses without overtime. Accordingly, the District proposes to meet the following shift manning requirements by July 1, 1982:

- 1 Shift Supervisor (SRO)
- 1 Senior Reactor Operator (SRO)
- 1 Assistant Reactor Operator (RO)
- 2 Non-Licensed Personnel
- 5 Total

To meet the District's proposed manning requirements, the District proposes to train and recommend for Senior Reactor Operator examination two additional individuals by mid-1981. Management is committed to achieve this schedule and if any unavoidable delays occur the NRC will be advised.

As stated above, no Technical Specification violations have occurred due to violation of minimum staffing requirements and it is management's intent to ensure that none occur in the future. However, the current and proposed license requirements could be violated if a member of the shift crew became suddenly ill or required immediate release from work due to other personal reasons. A qualified relief could be obtained promptly by call-out, either by the Shift Supervisor or Duty Supervisor, but in the interim a violation of the Technical Specifications would occur. The District understands that a license change to allow call-out for such a situation, not only for licensed personnel (including the designated Shift Supervisor) but for other key shift personnel (e.g., the Shift Technical Advisor), is to be included by the Fort Calhoun Station's NRC Project Manager in the District's Amendment Application submitted in response to the NUREG-0578 Category "A" modifications. The license change, in conjunction with our proposed upgrade program, should ensure adequate manning of the control room.