



Portland General Electric Company

Bill D. Myers - Vice President

October 30, 1980

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

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

Dear Mr. Eisenhut:

In response to your letter of July 31, 1980 concerning requirements for shift staffing, the Trojan Nuclear Plant will be in compliance with the requirement for having two Senior Reactor Operators, two Reactor Operators, and two nonlicensed operators on shift at all times, during Operational Modes 1-4, by July 1, 1982. We plan to begin implementing this extra staffing of an additional Senior Reactor Operator in January 1981. It is our intent to have a Shift Manager, a Shift Supervisor, two Reactor Operators, and two Auxiliary Operators on each crew by the end of 1981. By July 1, 1982, both the Shift Manager and Shift Supervisor will be the licensed Senior Reactor Operators.

The Shift Manager will be the member of management in charge of the plant on shift, and will have the duties of the current Shift Supervisor. The new Shift Supervisor will act as an assistant to the Shift Manager and ensure adequate supervision of activities both inside and outside the control room. It is our intent to include the current Shift Supervisor's office in the definition and boundaries of the control room for purposes of meeting the requirement of the Senior Reactor Operator being in the control room at all times. This office is adjacent to the control room with windows and an open door allowing both sight and sound contact at all times. In this manner, the new Shift Supervisor will have the freedom to move about the site as needed while the Shift Manager is in his office. One of the two will always be required to be in the control room as defined for this purpose.

Our license has recently been amended to require a minimum of three Auxiliary Operators per shift while operating. We would expect that this can be changed back to two Auxiliary Operators per shift when we have the two Senior Reactor Operators and the two Reactor Operators on each shift.

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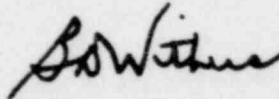
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Administrative procedures will include provisions to control movement of the above key shift personnel about the plant to ensure their availability during abnormal or emergency situations. Administrative procedures currently state the appropriate location of key personnel during such situations, and this will continue to be updated as personnel are added to the shift complement.

By November 1, 1980, administrative procedures will be revised to incorporate a policy to avoid routine overtime just to provide minimum crew staffing to meet Technical Specification requirements. These procedures will also include the four specific limitations identified in your letter concerning working hours and time off. Currently we are providing Shift Technical Advisor coverage by having a designated engineer on site for 24-hr. straight. Cooking, eating and sleeping facilities are provided, and the individual assigned does not normally work more than 12-hr. straight, so the spirit and intent of your requirements are being met. It is our plan to implement our long-term Shift Technical Advisor program on or before January 1, 1981 with Shift Technical Advisors currently in training. These engineers will probably be providing coverage for 12-hr. periods, which will also be in compliance with your requirements. Our administrative procedures currently require Plant General Manager approval of any necessary deviations to maximum work hour restrictions.

Sincerely,



Bart D. Withers  
Vice President  
Nuclear

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c: Mr. Robert A. Clark, Chief  
Operating Reactors Branch No. 3  
Division of Licensing  
U. S. Nuclear Regulatory Commission

Mr. Lynn Frank, Director  
State of Oregon  
Department of Energy