

Docket No. 50-346

License No. NPF-3

Serial No. 660

October 31, 1980



RICHARD P. CROUSE  
Vice President  
Nuclear  
(419) 259-5221

Director of Nuclear Reactor Regulation  
Attention: Mr. Darrell G. Eisenhower, Director  
Division of Licensing  
United States Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Eisenhower:

This letter is in response to your letter dated July 31, 1980, requesting Toledo Edison's compliance to the NRC Interim Criteria for Shift Staffing. The following is a listing of the requirements of your July 31, 1980 letter with our response to your requirements and when we plan to comply.

1. At anytime a licensed nuclear unit is being operated in Modes 1 through 4 for a PWR, the minimum shift crew shall include two licensed Senior Reactor Operators, one of whom shall be designated as the Shift Supervisor, two licensed Reactor Operators and two non-licensed Auxiliary Operators. Toledo Edison currently requires one Senior Reactor Operator, two Reactor Operators, and two non-licensed operators in modes 1 through 4. We will comply with the requirement of the second Senior Reactor Operator by July 1, 1982.
2. At all other times for a unit loaded with fuel, the minimum shift crew shall include the Shift Supervisor, who shall be a licensed Senior Reactor Operator, one licensed Reactor Operator and one non-licensed Auxiliary Operator. Toledo Edison currently complies with this requirement.
3. Further clarification of requirements to the shift staffing criteria stated above are as follows:
  - 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.  
  
--Toledo Edison currently is in compliance with this 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.  
  
--Toledo Edison will comply with this requirement by July 1, 1982.

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- 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.

--This item is not applicable to Davis-Besse Unit 1.

- 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.

--Toledo Edison is currently in compliance with this requirement.

- e. In addition to the operators specified in a., b., c., and d. above, for each control room from which a reactor is being operated, an additional licensed reactor operator (RO) shall be on site 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.

--Item 1 above addresses the requirement of having a minimum shift crew compliment which includes two reactor operators. Davis-Besse Technical Specifications specify that minimum shift crew composition may be less than minimum for a period not to exceed two hours provided immediate action is taken to restore the shift crew composition to minimum. With the addition of a Senior Reactor Operator required to be in the Control Room area as in item 1 and the requirement of item d. above, Toledo Edison will meet the requirement of a spare reactor operator in the Control Room.

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

--Toledo Edison currently is in compliance with the requirement as per the requirements of the order modifying the license of Davis-Besse Nuclear Power station regarding qualification of equipment operators for each shift dated March 5, 1980.

- 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.

--Toledo Edison is currently in compliance with this item.

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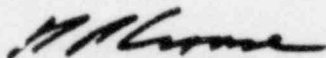
4. In addition, licensees of operating plants and applicants for operating licenses shall include in their administrative procedures (required by license conditions) provisions governing required shift staffing and movement of key individuals about the plant. These provisions are required to assure that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

--Toledo Edison is currently in compliance with this requirement. Administrative Procedures currently address the requirement by specifying that one Reactor Operator be in the control room at all times and that the Shift Supervisor shall remain in the control room area during times requiring the initiation of the emergency plan. The control room area includes the control room, the control room cabinet room, the computer room, and the Shift Supervisor's office. The Senior Reactor Operator specified in Item 1 above to be in effect July 1, 1982 will be required to stay in the Control Room Area.

5. The administrative procedures shall also set forth a policy concerning overtime work for the senior reactor operators, reactor operators, and shift technical advisor required by these interim criteria. These procedures shall stipulate that overtime shall not be routinely scheduled to compensate for an inadequate number of personnel to meet the shift crew staffing requirements.

--Toledo Edison will comply by December 1, 1980, with the requirements as stated in your July 23 letter and as also required, any deviation from these requirements may be authorized by the Assistant Station Superintendent or higher levels of management. Procedures will be modified to reflect this by December 1, 1980.

Very truly yours,



R. P. Crouse  
Vice-President, Nuclear

RPC/TDM/DLM/daw

cc: DB-1 Resident Inspector