

 Nebraska Public Power District

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October 31, 1980

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

Subject: Interim Criteria for Shift Staffing

Dear Sir:

Your letter of July 31, 1980 submitted interim criteria for shift staffing. We were requested to advise you within 90 days of receipt of your letter as to the date by which our shift staffing could be in compliance with the submittal criteria. We were also requested to discuss our plans, schedules, and commitments to meet the staffing criteria.

We wish to start by pointing out that since the beginning of commercial operation, it has been a Cooper Nuclear Station (CNS) goal to operate CNS with two Senior Reactor Operators (SRO's) on each shift. The Shift Supervisor has always had a SRO license. Although not a requirement of our Technical Specifications, we have made it a practice that our senior control room operator filling the Unit Operator I position also hold a SRO license. There have only been a few situations over the past 6½ years where we have not met the two SRO per shift goal. Although we agree with the concept of having two SRO licensed personnel on each shift, we believe there should be some flexibility to permit a SRO licensed person to leave in the event of an emergency such as sickness or injury prior to his replacement arriving on site. We also believe the adjunct requirement of having a SRO licensed person in the control room at all times is overly restrictive. Again, we do not disagree with the general requirement to have a SRO licensed person in the control room. However, we believe that it should be permissible for the SRO to go to the adjacent computer room or the adjacent critical switchgear room for a brief period of time for a necessary and important function providing there is another person in the control room in addition to the other licensed control room operator. In other words, we believe there should be some flexibility. We think it is undesirable to let a minor problem continue into an accident situation if it could have been prevented by an available person.

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The adjunct requirement of having a licensed operator in the control room in addition to one of the SRO licensed personnel poses the same problem. We believe the same flexibility should apply. We believe that it is necessary to have two persons in the control room at all times for security purposes and therefore have in existence a policy to enforce that requirement. However, we believe there may be situations where it may be prudent to permit one of the licensed operators to leave the control room providing he is replaced with another person (who may or may not be licensed).

We agree with the proposed requirement to increase the number of licensed personnel on each shift; however, we believe there should be some flexibility in their assignment. We do not believe it to be prudent to be so specific in regards to requiring a SRO and a RO to be in the control room at all times. There may be situations mentioned above where it may be necessary and desirable from a safety standpoint to briefly have only one licensed operator in the control room. Moreover, we believe the on-site shift supervisor should have some flexibility in dispatching his people in order to meet the highest level of plant safety without worrying if that one licensed operator remaining in the control room is a SRO or RO. We also believe that it is potentially counterproductive from the standpoint of overall plant safety to require more than two licensed operators be in the control room at all times to cover the situation where one (either the SRO or the RO) operator must leave for a short period of time.

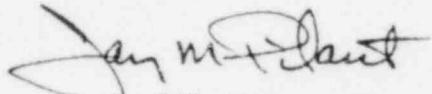
We currently have twelve SRO licensed personnel working on rotating shifts filling the Shift Supervisor position, the Unit Operator I position, and, at times, SRO licensed personnel are filling the STA position. We have seven RO licensed personnel working on rotating shifts filling the Unit Operator II position and providing the additional licensed operator on shift on two shifts. We also currently have three personnel in operator training and plan to have them take the license exam in the spring of 1981.

Thus, without attrition or other losses of the current licensed operators, we could possibly be in compliance with the interim criteria by mid-year 1981. However, considering the previous average loss of licensed personnel at 2 per year and the expected increase in loss of licensed personnel because of shortage of experienced personnel in the industry, as well as a loss of interest in the licensing program because

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of various happenings within the past 2 years such as the recent Enforcement Action Policy and the raising of passing scores for the licensed operator exam, we may have difficulty complying with the interim criteria earlier than the July 1982 deadline date. We will work toward an earlier compliance and, if a best estimate date is necessary, January 1982 is submitted.

Sincerely,



J. M. Pilant
Director of Licensing
and Quality Assurance

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