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EASD-80-417

December 9, 1980

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

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Interim Criteria for Shift Staffing

This letter is in response to Mr. Darrell G. Eisenhut's letter dated July 31, 1980 on the subject of shift staffing. Mr. Eisenhut requested that we discuss our plans, schedules and commitments to meet the staffing criteria set forth in his letter.

We have reviewed the requirements for shift manning and have determined that the Oyster Creek Plant is presently staffed as required by Mr. Eisenhut's letter. In regard to the adjunct requirements to this staffing, the Oyster Creek Plant meets all the requirements with the exception of item (b) having a licensed SRO in the control room at all times. The two licensed SRO's on each shift are the Group Shift Supervisor and the Group Operating Supervisor who are the senior members on shift and as such, have various responsibilities assigned to them which may require them both to be out of the control room. The circumstances that may require both SRO's to be absent from the control room simultaneously are rare and will be addressed in the Plant procedure.

An example of such a circumstance is a fire that may require the SRO in the control room to lead the fire brigade. During this situation, the control room would be without an SRO for that short period of time (5 to 10 minutes) until the other SRO could get to the control room. We feel this meets the intent of the shift staffing criteria.

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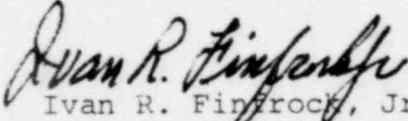
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The second part of Mr. Eisenhut's letter sets forth a policy concerning overtime work for the senior reactor operators, reactor operators, and shift technical advisors. The policy was first described in IE Circular No. 80-02 issued on February 1, 1980. In reviewing the IE Circular, we realized that to ensure compliance an increase in staffing of reactor operators would be required. Through recruiting efforts, we now have 16 personnel in training for a reactor operators license. The expected qualification date for these personnel to stand control room operator watches is July 1, 1981. The purpose of the overtime policy is to ensure that alert, attentive reactor operators are on duty at all times. We agree with this philosophy and will ensure that the onshift control personnel are alert and attentive. Because of all the variables involved, we believe that the best judge of the state of readiness of the shift personnel is the Group Shift Supervisor. To this end, instructions will be incorporated in the station procedures that the Group Shift Supervisor be responsible for ensuring that an alert and attentive shift compliment be maintained. It is our intention to maintain our current policy of limiting overtime of licensed personnel to no more than 16 continuous hours except as approved by the Station Management.

Should you have any questions concerning this letter, please contact Mr. James Knubel, BWR Licensing Manager at 201/455-8753.

Very truly yours,


Ivan R. Finrock, Jr.
Vice President