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March 31, 1981

Re: Docket Nos. 50-277
50-278

Mr. Darrell G. Eisenhut, Director
Division of Licensing
US Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Eisenhut:

Section I.A.1.3 of NUREG 0737, "Clarification of TMI Action Plan Requirements," extends the shift manning overtime criteria to all plant staff who perform safety-related functions. In correspondence dated February 20, 1981, S. L. Daltroff to D. G. Eisenhut, we committed to submitting a proposed plan for extending the overtime rules to other personnel by March 31, 1981. This letter presents our proposal on this matter.

NUREG 0737, Section I.A.1.3, requires administrative procedures setting forth a policy regarding working schedules such that the use of overtime is avoided to the extent practical for the plant staff who perform safety related functions. This is further defined to include senior reactor operators, reactor operators, health physicist, auxiliary operators, I&C technicians, and key maintenance personnel. The following overtime restrictions are specified:

- Rule 1. An individual should not be permitted to work more than 12 hours straight.
- Rule 2. There should be a break of at least 12 hours between all work periods.
- Rule 3. An individual should not work more than 72 hours in any 7 day period.

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Rule 4. An individual should not be required to work more than 14 consecutive days without having 2 consecutive days off.

Deviations to the above restrictions are permitted upon plant manager authorization. The NRC criteria further states that these rules do not apply during extended periods of shutdown for refueling, major maintenance or major plant modifications.

These overtime restrictions have been applied to the Senior Reactor Operators, Reactor Operators, and the Shift Technical Advisors at Peach Bottom as described in correspondence dated December 22, 1980, S. L. Daltroff to E. G. Eisenhut, and it is planned to apply them to non-licensed operators by April 30, 1981.

For other personnel (e.g., health physicists, I&C technician and maintenance personnel), we propose the following overtime policy to be implemented by April 30, 1981 for personnel involved in performing a safety related function on the operating unit.

1. An individual shall not be scheduled in advance to work more than 12 consecutive hours (excluding meal periods), nor more than 14 consecutive days.
2. If circumstances arise which require an individual to work more than 12 consecutive hours, such work shall be authorized by the individual's supervisor, in accordance with approved procedures, and with appropriate documentation of the cause.

The NRC overtime restrictions, rules 2 and 3, were considered to be of minimal value for other groups because the application of rules 2 and 3 could result in a need to change personnel in the middle of specific work assignments resulting in job disruptions, a reduction in the task specific experience level, and poor transfer of task information due to turnover difficulties (e.g., lack of man-to-man interface between a worker engaged on a task through late in the day and his replacement). This disruption in manpower scheduling could reduce the quality of job performance and may impact on plant safety.

As previously stated, we are proposing a modified overtime rule for other plant personnel performing safety related functions. Application of rules 2 and 3 appears to be of little value due to the nature of the job functions of non-operating personnel, because of increased administrative controls, and reduced task specific experience level.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Robert J. [unclear]", is written in dark ink on the page.