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December 4, 1980
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Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Interim Criteria for Shift Staffing

Dear Sir:

This letter responds to your July 31, 1980 letter, as amended in NUREG-0737 Section I.A.1.3, regarding shift staffing and overtime restrictions for key watchstanding personnel.

The Authority will revise again its administrative procedure to meet the new overtime restrictions. In order to meet the staffing and overtime requirements, additional operating positions (e.g., ROs, SROs) have been created. These positions will be filled by systematically upgrading, through training, the current plant staff. Additional personnel newly hired will be used to replace the positions vacated. This action plan consists of four sequential phases, as described below.

1. Hiring of Non-Licensed Operators

The Authority is in the process of hiring nine (9) non-licensed operators. The time required to complete the hiring process is not expected to exceed 12 weeks.

2. Training of Non-Licensed Operators

This program will commence immediately after completion of the hiring process. It will consist of three weeks of power plant fundamentals, three weeks of plant design orientation, and six weeks of structured on-the-job training, totalling 12 weeks.

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3. Selection and Training of Licensed Operators

This program will commence immediately after completion of the second phase. Trainees to become licensed operators will be selected either from the new hires, trained in phase 2 above, or current plant personnel. It will consist of:

- 10 weeks of power plant fundamentals
- 2 weeks of university reactor training
- 10 weeks of plant design and orientation
- 12 weeks of control room operations training
- 2 weeks of simulator hot license certification
- 4 weeks of intensive review and evaluation
- 3 weeks of self-study and USNRC examinations
- 4 weeks of holidays and vacation.

Added to the 47 weeks cited above is an estimated six weeks period for examination processing by the USNRC, totalling 53 weeks.

4. Senior Operator Upgrade Training

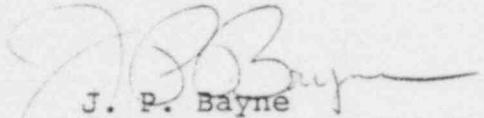
This program will commence immediately after completion of phase 3 above. It will consist of four weeks of technical training, 12 weeks of on-the-job training, and one week of USNRC examinations. Review and evaluation will be conducted concurrently with on-the-job training. To this time must be added an estimated six weeks for examination processing by the USNRC, totalling 23 weeks.

This action plan requires 100 weeks to complete and thus cannot be completed before November 3, 1982 - approximately 16 weeks beyond the deadline for completion of July 1, 1982. However, we consider that this plan is the most effective and expeditious manner to comply with the staffing need of the FitzPatrick Plant since it allows maximum use of trained and experienced operations personnel.

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Should you have any questions regarding this matter please do not hesitate to contact this office.

Very truly yours,


J. P. Bayne
Senior Vice President
Nuclear Generation