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October 31, 1980

100-01

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Comm.
Washington, D.C. 20555

SUBJECT: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Interim Criteria for Shift Staffing
(File: 1510.3, 2-1510.3)

Gentlemen:

In response to your July 31, 1980 letter to all licensees concerning "Interim Criteria for Shift Staffing", Arkansas Power & Light Company has examined the current staffing practices and capabilities in light of the interim criteria for shift staffing provided and herein provides the following plans, schedules, and commitments to meet these staffing criteria.

Current AP&L administrative requirements and staffing levels satisfy the adjunct requirements of items (a), (d), (f), and (g). Action was initiated in June, 1980, to achieve a staffing level and organization which would meet the remaining requirements, items (b), (c), and (e). AP&L is aggressively recruiting personnel to achieve a staffing level to support the interim criteria operating organization. Training and recruiting is scheduled to achieve the required shift staffing level by the stated July 1, 1982 date.

Several recent NRC requirements have a substantial impact on utilities' ability to respond quickly to mandated changes in staffing levels. These are basically condensed as follows:

- (1) Pre-examination requirements for operator license candidates have been stiffened and lengthened. This extends the time for licensing an operator.
- (2) Operator requalification requirements have been upgraded. This requires considerably more time dedicated to retraining.

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- (3) Limitations on overtime have been imposed, which, when coupled with above requirements, force utilities to opt for a six-shift rotation schedule to allow adequate control over overtime for vacations and for licensing and requalification training.
- (4) Interim shift staffing criteria require substantial increases in shift staffing levels above the levels indirectly required to control overtime and supply upgraded requalification training.

In order to adequately treat all staffing-related requirements, an increase in overall shift staffing level is required; from approximately 50 (both units) to a minimum of 96 shift workers, and from 30 licensed shift operators to a minimum of 48 licensed shift operators, or a 60% increase in the licensed onshift operating staff.

To achieve our schedule, a total of fourteen NRC license exams must be administered from now through July, 1982. It also requires four license training programs to run simultaneously from August, 1980 through June, 1982, to administer required training and examination to our current seven groups of license candidates per unit.

Provided NRC Operator Licensing Branch can support our efforts, and a 75% success rate for Reactor Operator licensing and a 66% success rate for Senior Reactor Operators licensing are achieved, all staffing and administrative requirements can be met by the July, 1982 date.

Your letter also addressed the overtime work for senior reactor operators, reactor operators, and shift technical advisors. As noted in the letter, Reid to Cavanaugh, dated March 10, 1980, AP&L utilizes site engineering staff personnel (i.e., degreed engineers) to be the Shift Technical Advisors (STA). The STA serves a 24-hour duty day on a rotating basis and is onsite at all times during this duty day. Sleeping quarters are available onsite and the STA is available to the control room within ten minutes of being called. The 24-hour duty day may appear to be in conflict with the recommended overtime restrictions. However, it must be realized that during a duty day, the STA does not work the entire twenty-four hour duty day. In fact, it is highly unlikely that the STA would work more than twelve hours straight or more than twenty-four hours in a forty-eight hour period. The present AP&L method of STA duty days is in agreement with the recommended overtime restrictions. Therefore, AP&L will continue to provide STA coverage in this manner.

Very truly yours,

David C. Trimble

David C. Trimble,
Manager, Licensing