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December 31, 1980

BECO Ltr. #80-318

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

License No. DPR-35  
Docket No. 50-293

Additional Information on Shift Staffing

Ref: a) NRC Letter (D.G. Eisenhower) to all Operating  
Reactors titled "Interim Criteria for Shift  
Staffing" dated July 31, 1980.

Dear Mr. Eisenhower:

In a letter to you dated October 15, 1980, we transmitted our response to the interim shift staffing criteria as requested in reference a). However, our commitments relative to an overtime policy restricting operators from working no more than 12 hours straight while performing safety related control room duties have proven too restrictive. We therefore revise our commitments in that regard as follows:

As stated previously, Boston Edison does not routinely schedule overtime to compensate for an inadequate number of personnel to meet the shift crew requirements of our technical specifications. Shifts are scheduled for 8 hour durations only, however, when overtime is required due to vacations, sickness or routine work beyond the shift crew staffing requirements, the following limitations will be utilized:

If a nuclear plant operator is required to work in excess of his normal 8 hours shift, every effort will be made to obtain a qualified relief to insure that the operator does not exceed 12 hours in the control room performing safety related functions. The Nuclear Operations Manager or his Deputy's approval must be obtained in order to exceed the 12 hours, however; under normal circumstances, an operator shall not exceed 16 hours performing safety related control room functions.

Should circumstances arise requiring deviation from the above restrictions, such deviation may be authorized by the Nuclear Operations Manager or higher levels of management in accordance with published procedures and with appropriate documentation of the cause.

An administrative policy governing these overtime limitations is currently in effect at Pilgrim and Administrative Procedures will be revised to reflect this criteria by January 16, 1981.

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If you should have any comments or questions concerning this response, please do not hesitate to contact us.

Very truly yours,

A. V. Morisi

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