



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 WASHINGTON, D.C. 20555

SECY

REQUEST REPLY TO SECY BY 10/9

OFFICE OF THE
 COMMISSIONER

October 2, 1981

COMVG-818

MEMORANDUM FOR CHAIRMAN PALLADINO
 COMMISSIONER BRADFORD
 COMMISSIONER AHEARNE
 COMMISSIONER ROBERTS

SUBJECT: SECY-81-440 NUCLEAR POWER PLANT WORKING HOURS

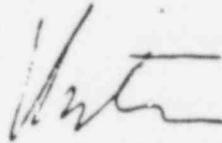
I would add to the guidance on nuclear power plant working hours. It is good and reasonable guidance so far as it goes, especially when applied to plant personnel other than operators. (In fact, it is not inconsistent with many of the agreements between union and management which govern working conditions at operating nuclear power plants.) But to assure the availability of well-rested and alert operators an additional requirement should be added that specifies the minimum number of operating shifts for each mode of the plant.

The need for a well-rested and alert operating crew is critical to safely operating a nuclear power plant. Many incidents that could cause core damage or release radioactive material to the environment require intervention by the operator to protect the health and safety of the public. In addition, routine work performed by personnel other than operators must be reviewed and approved by a licensed operator prior to performing the work. This assures the work will not interfere with generating power, violate the operating license or injure personnel.

In a licensing sense, the operator should be treated at least as stringently as plant equipment used to mitigate accidents. Operating licenses recognize the need for operable safety equipment for various nuclear plant conditions. For example, when a plant is at full power all the emergency diesels must be ready to energize the emergency buses if needed. If even one is not, then the plant must be shut down. Similarly, at full power there must be a sufficient number of operators fit to run the plant safely. The current operating licenses recognize this to an extent that each shift must have a minimum number of licensed and non-licensed operators for each mode of the plant. Extending the

existing specification one more step by requiring a minimum number of available shifts for each operating mode would assure an adequate total number of fit operators. This would avoid the recent experience with Salem and Diablo Canyon where the Commission was required to pass judgment on the adequacy of shift manning in the absence of a reasonable specification.

I believe the attached draft memo to the Executive Director should direct the staff to develop a technical specification requiring a minimum number of shifts for different plant modes as an addition to the current requirements for minimum shift complements.



Victor Gilinsky

Attachment: a/s

SECY please track responses.

cc: OGC
OPE
SECY