

IE REVIEW AND EVALUATION OF LICENSEE
IMPLEMENTATION OF TMI ACTION
PLAN REQUIREMENTS

Action Item No: 1.A.1.3

SHIFT MANNING: PART 1, LIMIT OVERTIME

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement

Utility: BALTIMORE GAS AND ELECTRIC COMPANY
Facility: CALVERT CLIFFS NUCLEAR POWER PLANT
Unit No.: UNITS 1 and 2
Docket No.: 50-317; 50-318

Signature: EAB, Director, Division
of Resident and Project Inspection, Region

Date: 6/6/81

Parent Region Contact: _____

William Lazarus

Position

Licensees of operating plants shall set forth in their administrative procedures, a policy, the objective of which is to operate the plant with the required staff and develop working schedules such that use of overtime is avoided, to the extent practicable, for the plant staff who perform safety-related functions (e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, I&C technicians and key maintenance personnel).

IE Circular No. 80-02, "Nuclear Power Plant Staff Work Hours," dated February 1, 1980 discusses the concern of overtime work for members of the plant staff who perform safety-related functions.

The staff recognizes that there are diverse opinions on the amount of overtime that would be considered permissible and that there is a lack of hard data on the effects of overtime beyond the generally recognized normal 8-hour working day, the effects of shift rotation, and other factors. NRC has initiated studies in this area. Until a firmer basis is developed on working hours, the administrative procedures shall include as an interim measure the following guidance, which generally follows that of IE Circular No. 80-02.

In the event that overtime must be used (excluding extended periods of shutdown for refueling, major maintenance or major plant modifications), the following overtime restrictions should be followed:

- (1) An individual should not be permitted to work more than 12 hours straight (not including shift turnover time).
- (2) There should be a break of at least 12 hours (which can include shift turnover time) between all work periods.
- (3) An individual should not work more than 72 hours in any 7-day period.
- (4) An individual should not be required to work more than 14 consecutive days without having 2 consecutive days off.

However, recognizing that circumstances may arise requiring deviation from the above restrictions, such deviation shall be authorized by the plant manager or his deputy, or higher levels of management in accordance with published procedures and with appropriate documentation of the cause.

If a reactor operator or senior reactor operator has been working more than 12 hours during periods of extended shutdown (e.g., at duties away from the control board), such individuals shall not be assigned shift duty in the control room without at least a 12-hour break preceding such an assignment.

NRC encourages the development of a staffing policy that would permit the licensed reactor operators and senior reactor operators to be periodically assigned to other duties away from the control board during their normal tours of duty.

If a reactor operator is required to work in excess of 8 continuous hours, he shall be periodically relieved of primary duties at the control board, such that periods of duty at the board do not exceed about 4 hours at a time.

The guidelines on overtime do not apply to the shift technical advisor provided he or she is provided sleeping accommodations and a 10-minute availability is assured.

Discussion and Conclusion

The staff reviewed the licensee's policy for limiting overtime, as described in Calvert Cliffs Instruction 140-A, "Shift Staffing and Overtime," dated January 28, 1981, and found it to be in conformance with the staff position with the exception that it specified that individuals would not work more than 72 hours in any pay period vs. 72 hours in any 7 day period. The licensee has agreed to change the requirement in this instance to match the wording of the position guidelines.

Based on this review, the staff finds the Calvert Cliffs policy for the limitation of overtime acceptable.