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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

January 31, 1981

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

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2, Docket Nos. 50-317 & 50-318
Response to NUREG-0737

- REFERENCES: (a) Letter from D. G. Eisenhower to All Licensees
of Operating Plants and Applicants for Operating
Licenses and Holders of Construction Permits
dated October 31, 1980; NUREG 0737
- (b) Letter from C. H. Poindexter to D. G. Eisenhower
dated December 30, 1980

Gentlemen:

Reference (a) required documentation reflecting the status of our efforts related to TMI Lessons Learned. Reference (b) further clarified and updated our response to reference (a). The enclosure to this letter further clarifies and updates our position with respect to shift manning.

If any additional information is required, we would be pleased to provide it to you.

Very truly yours,

A. E. Lundvall, Jr.
Vice President - Supply

AEL/RLW/gla

Enclosure

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S.I.

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ENCLOSURE 1

I.A.1.3 Shift Manning

Administrative procedures have been implemented to comply with the position regarding overtime set forth by NUREG-0737, with one exception.

Reference (a) provides for a break of at least twelve (12) hours, (which can include shift turnover time) between all work periods. Our current administrative procedures require that this limitation be normally adhered to for work periods, including safety-related functions. However, to preclude undue stress on the shift manning rotation, an exception to this rule has been allowed in the case of two (2) work periods separated by only eight (8) hours, as long as neither of these two (2) work periods exceed ten (10) hours in length and does not occur to any one individual with a frequency of greater than once in one payroll week period, and further meets the guidelines of:

1. An individual should not be permitted to work more than twelve (12) hours straight (not including shift turnover time),
2. An individual should not work more than seventy-two (72) hours in one payroll period, and
3. An individual should not be required to work more than fourteen (14) consecutive days without having two (2) consecutive days off. (For the purposes of this guideline, a "day" of work is considered to be one in which the individual works for more than four (4) hours in one day).

We feel that this exception is highly desirable and beneficial to operating personnel in that the additional scheduling flexibility allows us to minimize instances where personnel need to be called in on days off, or in the middle of the night, interrupting their planned rest periods. This provision further enhances planned rest periods by allowing minor schedule changes to lengthen vacation periods as desired by operating personnel.

Mr. D. G. Eisenhut

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January 30, 1981

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
Mr. E. L. Conner, Jr. - NRC