

TMIA Exh. 89

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USNRC

Metropolitan Edison Company  
Post Office Box 480  
Middletown, Pennsylvania 17057

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Writer's Direct Dial Number

OFFICE OF SECRETARY  
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BRANCH

December 4, 1981  
L1L 356



Mr. Thomas M. Novak  
Assistant Director for Operating Reactors  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Novak:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)  
Operating License No. DPR-50  
Docket No. 50-289  
TMI-1 Shift Manning

This letter is in answer to paragraph two of your letter Docket No. 50-289 of December 1, 1981 in which you requested our plan for continued staffing of the plant while in cold shutdown prior to restart.

The following individuals (previously Licensed) who took the NRC examinations in October and did not pass have been removed from all licensed duties\* and will not be used for licensed duties without prior notification of NRC, or until they have passed the required NRC examination(s) and have been officially issued a new NRC license:

- S
- GG
- U
- V (See L1L 351)

The following individuals who took the NRC October examinations and did not pass were not previously licensed and will not perform licensed duties until such time as they are licensed by the NRC:

- R
- WW
- RR
- KK

It is our plan to use our remaining operators who currently hold a cold shutdown license to fulfill licensed duties as long as the plant remains in the cold shutdown condition. Justification for those operators currently holding cold operating licenses but who did not pass all sections of the October NRC examination, and are planned to be used to meet the Technical Specification license requirements for the cold shutdown condition are contained in Attachment 1.

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As defined by Technical Specification Requirements:  
training may continue in accordance with 10 CFR 55.9.  
Metropolitan Edison Company is a Member of the General Public Utilities System

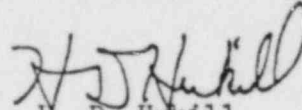
Mr. Thomas M. Novak

-2-

LIL 356

A copy of this letter will be provided to parties of record on the next scheduled day of the reopened ASLB hearings.

Sincerely,



H. D. Hukill  
Director, TMI-1

HDH:vjf

Attachment

cc: Mr. Paul F. Collins

## JUSTIFICATION

Indicated below is the justification for those operators currently holding cold operating licenses but who did not pass all sections of the October NRC examination, whom we consider to be competent to meet the technical specification license requirements for the cold shutdown condition of the plant:

### Senior Reactor Operators

1. I - Mr. I has been licensed as a RO at TMI-1 since 1974 and as a SRO since 1977. He has continually performed his licensed duties in a highly competent and reliable manner. He was promoted to Shift Supervisor in April 1978 and continued his superior performance in that senior position. To assist Mr. I in carrying out his assigned duties on shift, a minimum of two Reactor Operators who successfully completed all sections of the October RO examination will be assigned to his shift at all times.
2. F - Mr. F has been licensed as a RO at TMI-1 since 1974 and as a SRO since 1977. He has performed his licensed duties in an effective and competent manner during that period. He also served in the U. S. Navy nuclear program as an Electronics Technician qualified as Reactor Operator. Mr. F was just recently promoted to Shift Supervisor, having been assigned as Shift Foreman from March 1978 to September 1981. Mr. F passed all requirements of the SRO examination, including the oral examination, except for one section of the written examination (K-65%). We are commencing to retrain him and consider he will soon be ready to retake this section.

### Reactor Operators

3. Z - Mr. Z had approximately six years of Navy nuclear experience prior to coming to TMI. He has performed in a very satisfactory manner as a licensed Reactor Operator since 1978. He was promoted to Shift Foreman in October 1980. Mr. Z passed all requirements for the SRO license, including the oral and simulator examinations, except for one section (K-64%) of the SRO written examination. Based on his past performance and his performance on the October examination (passed all RO requirements) I consider Mr. Z highly capable of performing licensed RO duties in the cold shutdown condition. He will not be used to meet the technical specification requirements for an SRO since he does not currently hold a cold SRO license. We are commencing to retrain him and consider he will soon be ready to retake the section of the SRO examination he failed.
4. G - Mr. G received his RO license in 1974 as one of the original operators of TMI-1. He has demonstrated during his years of operation that he is one of the most competent Reactor Operators and most qualified Control Room Operator in the entire plant. He is highly respected by the Shift Supervisors and Foremen for his extensive knowledge of the plant and his ability to perform in a professional and competent manner in difficult and demanding situations. Mr. G received a grade of over 80% on the written examination and passed the oral examination, but failed one section of the written (F-63%). As in the case of the

other operators who failed only one section of the examination, we are commencing to retrain him and consider he will soon be ready to retake the section he failed.

5. T - Mr. T was an original operator of TMI-1 and received his RO license in 1974. He has always carried out his licensed duties in an exceptionally competent and professional manner and is especially capable in unusual or abnormal situations. Because of his extensive knowledge and experience in the plant he is frequently called upon by his supervisors for assistance in these type of situations. Mr. T successfully passed the written portion of the examination but failed the oral. It is our considered opinion that a major contributing factor to his failure of the oral examination was "boardsmanship", i.e., he is a very quiet and reticent individual who, therefore, has a natural tendency to have difficulty with oral type examinations. We intend to attack this problem by giving him repeated oral examinations by senior and knowledgeable members of the plant staff. I am confident he will be well prepared for his re-examination.

December 18, 1981  
LLL 368

'82 JAN -4 P5:23

OFFICE OF SECRETARY  
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Mr. Thomas M. Novak  
Assistant Director for Operating Reactors  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Novak:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)  
Operating License No. DPR-50  
Docket No. 50-289  
TMI-1 Shift Manning

This letter is in response to your letter Docket No. 50-289 of December 1, 1981, in which you requested that we provide our proposed operator staffing plan for TMI-1. Our letter LLL 356 of December 3, 1981, provided the information requested concerning shift staffing prior to restart. This letter outlines our plans for restart and continued operation at power.

Our long term goal and current planning are directed towards regaining capability to have a six-shift rotation. The loss of seven licensed operators (four RO's and three SRO's) in the last year has us currently in a situation where we have the capability for staffing five shifts consistent with the shift manning commitments set forth in ASLB's Partial Initial Decision of August 27, 1981. We can and will at all times meet or exceed our Technical Specification requirements for shift manning and the license manning conditions for the operation of TMI-1 as set forth in the ASLB Partial Initial Decision on Management Issues. We will also continue to comply with the Staff Guidelines on overtime and training requirements.

The NRC oral and written re-examination of operators who failed one or more sections of the RO or SRO examinations administered in October is now scheduled for the week of February 8, 1982. Our staffing plan must therefore be shown as two separate plans; one for startup before the re-examinations are administered and graded, and a second based on operations after the re-examinations.

Licensed Operator Manning Plan Before Re-Examination

There are currently 21 individuals licensed as either RO or SRO as a result of the October NRC License examinations. Some of these individuals are not normally shift operating personnel, but are filling other positions in plant

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management, training and as an STA. A specific program for ensuring non-operations department licensed personnel are fully aware of current plant status and operation, which will include instructional watches, will be conducted. This potentially includes three individuals from the Training Department, who were licensed operators prior to assignment to the training department; and one STA. These individuals will also be assigned on-shift with our more knowledgeable and experienced SRO licensed shift supervisors. This additional training is not necessary for the two SRO licensed individuals from plant management as they are deeply involved in plant operations on a day-to-day basis, and are well versed on plant status and conditions. Shown below is the status of the currently licensed personnel.

	<u>SRO</u>	<u>RO + Trained as SRO</u>	<u>RO</u>
Normal Shift Operating Staff	4	2	9
Others	6	0	0
<b>TOTAL</b>	<b>10</b>	<b>2</b>	<b>9 = 21</b>

It may also be desirable during this period to alter our shift manning for short periods of time (less than 10 days) and have licensed operators working, in effect, a four shift rotation.

#### Licensed Operator Manning Plan After Re-Examination

Training has commenced for those operators who failed the October examination. Of those who failed, four will not be recommended for re-examination in February. We do anticipate recommending three RO's and five SRO's for the February re-examination. Shown below is the status of Licensed personnel, assuming all these individuals pass their examination.

	<u>SRO</u>	<u>RO + Training as SRO</u>	<u>RO</u>
Normal Shift Operating Staff	9	0	12
Others	6	0	0
<b>TOTAL</b>	<b>15</b>	<b>0</b>	<b>12 = 27</b>

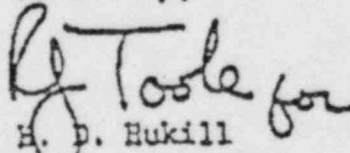
After the examination results are available we will restructure our shift manning to minimize the use of non-operating staff personnel.

The following steps are being taken to insure we achieve our goal of a six-section rotation and that appropriate and adequate training is maintained:

- The training week as part of the shift rotation will be retained. To reduce from six to five sections, we have eliminated the relief week from the shift rotation which are normally assigned to the 0700-1500 shift. This will insure that continuity and adequacy of training is maintained.
- An additional five RO trainees from the operations department will have completed their training program in time to permit them to take the NBC RO examination during the week of February 8, 1982 and simulator examinations scheduled in March. These 5 will be in addition to the 12 in the above tabulation.
- About four auxiliary operators will enter the RO training program in January 1982.
- About seven new hires will enter the RO training program in February or March 1982.
- About four RO's will enter the SRO training program early in the year. This program is designed to take six months. We have budgeted for seven shift supervisors and seven shift foremen, for 1982 and will make every effort to achieve this number.
- The operator training staff will be augmented by either internal or external resources to assure that use on shift of licensed members of the Training Department staff does not have an unacceptable affect on the training program implementation.

Based on the above, I consider that TMI-1 has adequate licensed personnel to safely restart and operate the Unit and that every reasonable effort is being taken to achieve the desired six section rotation in a timely manner.

Sincerely,

  
H. D. Hukill  
Director, TMI-1

EDH:WJM:vjf

cc: Mr. Paul F. Collins

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETER  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD  
AND THE SPECIAL MASTER

'82 JAN -4 P5:23

In the Matter of )  
)  
METROPOLITAN EDISON COMPANY )  
)  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-289  
(Restart)

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

CERTIFICATE OF SERVICE

I hereby certify that copies of "TMIA MOTION TO DIRECT EXECUTION OF AFFIDAVIT AND TO ENTER DOCUMENTS INTO EVIDENCE" have been served on the following persons by deposit in the United States mail, first class postage prepaid, on or before January 4, 1982.

- \* Judge Gary L. Milhollin  
c/o Judge Ivan W. Smith  
Chairman, ASLB  
U.S. NRC  
Washington, D.C. 20555
- \* Ivan W. Smith, Chairman  
ASLB  
U.S. NRC  
Washington, D.C. 20555
- Dr. Walter H. Jordan  
ASLB  
881 West Outer Drive  
Oak Ridge, Tennessee 37830
- Dr. Linda W. Little  
ASLB  
5000 Hermitage Drive  
Raleigh, North Carolina 27612
- \* Gary J. Edles, Chairman  
ASLAB  
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Washington, D.C. 20555
- \* John H. Buck  
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- \* Christine N. Kohl  
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- \* Reginald L. Gotchy  
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Office of the Secretary  
U.S. NRC  
Washington, D.C. 20555

*Louise Bradford*  
\_\_\_\_\_  
Louise Bradford

\* - Hand delivered January 4, 1982