PSNH PUBLIC SERVICE
Company of New Hampshire

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United States Nuclear Regulatory Commission
Washington, DC 20555

Attention: Mr. Frank J. Miraglia, Chief
Licensing Branch No. 3
Division of Licensing

References: a. Construction Permits CPPR-135 and CPPR-136, Docket Nos. 50-443 and 50-444

b. PSNH Letter, dated February 18, 1982 "Upgraded Qualifications for Seabrook Station Licensed Operators," W. P. Johnson to R. L. Tedesco

Subject: Meeting Notes; Upgraded Qualifications for Seabrook Station Licensed Operators

Dear Sir:

On Tuesday, March 30, 1982, we met with members of your staff to present the basis for operating Seabrook Station without having a Shift Technical Advisor (STA) on-shift. This position was outlined in Reference (b). NUREG 0737 Task Item I.A.1.1 states that "the need for the STA position may be eliminated when the qualifications of the shift supervisors and senior operators have been upgraded and the man-machine interface in the control room has been acceptably upgraded." The meeting was requested by Public Service Company of New Hampshire (PSNH) because the NRC has not yet established the detailed elements of an acceptable upgrading in these areas. Public Service Company of New Hampshire presented a detailed description of substantial improvements made in both of these areas.

The following summarizes the information presented by the applicant in support of the elimination of an STA on-shift:

1. The Seabrook Station operators have been upgraded by a comprehensive academic training program taught by Memphis State University in addition to the licensed operator training program.

2. The training program given to the Shift Superintendents and Unit Shift Supervisors exceeds the requirements stated in NUREG 0737 Task I.A.1.1 "Shift Technical Advisor." Therefore, each operating shift at Seabrook Station will be staffed by a minimum of two individuals whose training exceeds that of a Shift Technical Advisor.

3. The improved operator training program framework was implemented prior to the incident at Three Mile Island (TMI). Only minor changes to the program were necessary as a result of NRC recommendations and guidelines imposed after TMI.

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4. The contact hours of training provided the licensed operators at Seabrook Station exceed the INPO recommended training for Shift Technical Advisors contained in NUREG 0737, Appendix C. INPO recommends 1390 contact hours of training in various subject areas. The SRO licensed Shift Superintendents and Unit Shift Supervisors participating in the cold license program at Seabrook Station will receive 2280 contact hours.

5. The main control board at Seabrook Station has been designed from conception to improve the man-machine interface. Additionally, periodic reviews (pre-TMI and post-TMI) have resulted in significant changes to the control board to improve the man-machine interface. These reviews were significantly enhanced through operator assessment of the Seabrook Station site-specific simulator which is located on-site.

6. Extensive dynamic graphics capabilities have been designed to aid the control room operators in assessing abnormal events. This, coupled with color coding, functional grouping of switches, and mimic buswork has resulted in a substantially improved control board.

7. PSNH has recently begun a review of the control board to address NUREG 0700. A preliminary assessment indicates that no substantial changes will be necessary.

8. PSNH defines two categories of administrative responsibilities-inherent and collateral. Inherent administrative responsibilities are an integral, essential part of safely operating a nuclear power plant and must be performed by the licensed operators on-shift. Collateral responsibilities are not essential to safe and efficient operation and will be assigned to off-shift personnel. PSNH has provided the necessary off-shift expertise to perform these collateral duties in the positions of the Day Shift Superintendents, Operations Administrative Supervisor, and the Radioactive Waste Supervisor. As a result, the licensed shift supervisory personnel will not be burdended with unnecessary administrative responsiblities which could distract them from their prime functions of ensuring safe and efficient station operation.

9. The operational assessment function was designated in NUREG 0737 to be performed by the STA. PSNH will perform this function through the Independent Safety Engineering Group (ISEG). The composition of the ISEG will include Operations Department personnel assigned on a rotating basis.

10. During an abnormal event, the Shift Superintendent will report to the control room of the affected unit. Upon arrival in the control room he will assess the following critical plant parameters:

    a. The status and integrity of the core and associated systems.

    b. The status and availability of the heat sink and heat removal capabilities.

    c. The status and integrity of containment.

d. The status of station radiation levels and potential release paths.

Based on his assessment of the parameters, he will function as an advisor to the Unit Shift Supervisor and as the Emergency Director until relieved in accordance with the Emergency Response Plan.

11. Unlike the STA, the Shift Superintendent holds a current SRO license and can relieve the Unit Shift Supervisor if it is felt that the Unit Shift Supervisor is not capable of proper performance commensurate with the situation which exists.

Public Service Company of New Hampshire concluded the presentation by stating the following positions:

1. The proposed number and capabilities of licensed operators is sufficient to handle all normal, abnormal, and emergency operating situations which can occur at a nuclear generating facility.

2. Our program will adequately upgrade the qualifications of operating personnel and improve the control room man-machine interface such that the long-term program for eliminating the Shift Technical Advisor, as described in NUREG 0737, has been satisfied.

3. The addition of a Shift Technical Advisor to the proposed organization will hinder, rather than help, interface of operations personnel necessary to handle operating situations in a professional manner.

Subsequent to our presentation, the NRC staff present concurred that our program appeared to have substantial merit worthy of further consideration. However, due to the complexities of our proposal, the NRC felt they needed several weeks to assess our program. It is our understanding that the draft Safety Evaluation Report (SER) scheduled to be published in May, 1982 will contain the NRC's position with respect to the operation of Seabrook Station without an STA.

Very truly yours,

George S. Thomas

George S. Thomas
Nuclear Production Superintendent

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