



Wisconsin Electric POWER COMPANY
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May 19, 1982

Mr. D. G. Eisenhut, Director
Division of Licensing
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Dear Mr. Eisenhut:

DOCKET NOS. 50-266 AND 50-301
SHIFT AND LICENSED OPERATOR STAFFING
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Our letter of November 3, 1980 provided information in response to your letter of July 31, 1980 relative to shift staffing at the Point Beach Nuclear Plant (PBNP). The purpose of this letter is to advise you of progress towards meeting our goals for increased staffing, as well as to again point out concerns regarding the availability of qualified personnel in the nuclear industry. This letter is also intended to be a response to item I.A.1.3.2, "Minimum Shift Crew", in the enclosure to your May 5, 1982 letter related to NUREG-0737 items. With reference to item III.A.1.2, "Staffing Levels for Emergency Situations", in the same enclosure, we have recently met with Mr. J. G. Keppler, Region III Administrator, regarding this matter. A copy of our May 19, 1982 letter to Mr. Keppler is attached for your information and is intended to serve as our response to item III.A.1.2.

Our November 3 letter described the design and operating philosophy of PBNP, as well as enumerating problems in staffing since the Three Mile Island accident. We also described actions we had taken in response to those problems. While stating our belief that no increase is needed in what has proven to be adequate staffing for safe and reliable operation of PBNP during a period of over ten years, we nonetheless provided our plan for adding additional personnel. We also emphasized the assumptions which formed the bases of our ability to carry out the plan. Those bases included an adequate supply of qualified applicants, some with previous nuclear experience; increased physical facilities; and, implicitly, minimal losses of present personnel. In a letter

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dated April 14, 1981 to Mr. H. R. Denton, we stated our intention to achieve an eight-person shift complement by July 1982 with the plan submitted November 3. Further, a letter dated February 18, 1982 to Mr. Keppler noted that training is actively underway in an effort to carry out the plan.

During the time since our November 3 letter, we have taken the following steps towards meeting our July 1, 1982 goal:

1. A Technical Support Center has been constructed at the PBNP site which provides, among other facilities, additional training facilities.
2. The personnel allowance for the PBNP staff has been increased from 158 to 190 employees.
3. The training staff has been increased to five full-time employees plus two part-time employees.
4. A Basic Nuclear Plant Operations Trainee Program has been organized by our corporate training staff with the first class starting March 29, 1982. This will provide qualified personnel into the auxiliary operator trainee positions at PBNP.
5. Recruiting of personnel with nuclear experience has been intensified to staff the position of operations supervisor trainee.
6. The establishing of a sixth operating shift has been authorized. This sixth shift will enhance training opportunities.
7. The position of control operator trainee has been utilized to enhance training for reactor operator license candidates.
8. Where appropriate, significant increases in compensation have been authorized.

With the above actions, we are moving toward establishing six shifts with eight people per shift with the following shift complement:

- 1 shift supervisor (SRO)
- 1 operating supervisor (SRO)
- 2 control operators (RO)
- 1 extra operations person (RO)
- 3 auxiliary operators (unlicensed)

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While we will begin initiation of the eight-person shift as of July 1982, completion of this action will take several weeks. Also, the timing of the second SRO on all shifts is uncertain because we do not know when examination results will be available. It should be noted that there may be occasions in the future when newly promoted operating supervisors may hold a RO license until the SRO examination can be taken. In addition, we will not be able to provide a third RO-licensed person on all shifts until necessary examinations are passed. We do plan on having a number of persons take NRC license examinations in June 1982; however, the results of those examinations and the time required to determine results is obviously not known at this time.

The above discusses our activities related to adding additional personnel for an eight-person shift and ultimately for a sixth shift. Final implementation is obviously dependent upon retention of present employees. Our letters dated November 3, 1980, April 14, 1981, and February 18, 1982 have pointed out some of the problems with retaining current employees. We are quite certain that the NRC is cognizant of and concerned about the increasing problems facing the nuclear industry with regard to obtaining, training, and retaining qualified persons. We believe that it needs to be recognized that some NRC activities have exacerbated the present shortage of personnel in the nuclear industry. For example:

1. The requirements for significant modifications to operating plants in a short time period have created an additional demand for qualified technical personnel. Not only are the utilities themselves devoting considerable effort towards designing and installing new equipment, but consultants and suppliers who are engaged to assist in these programs satisfy their increased personnel needs by recruiting from the utilities, among others.
2. Increased surveillance activities and enforcement policies are perceived, by some nuclear personnel, to be a form of harrassment which they believe to be overbearing and which causes some qualified individuals to leave the industry and discourages others from entering the industry.
3. The application of the provisions of NUREG's and Regulatory Guides regarding staffing as required regulation results in inadequate consideration being given to specific plant design or location differences.

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4. The release of names of licensed reactor operators by the NRC in response to Freedom of Information Act requests apparently is being used as a source of information for the recruiting of such employees by other employers.
5. The NRC and ACRS's requirement that new plants have in their own employment individuals with recent commercial operating experience is detrimental to the interests of plants already in operation. It is obvious that such experience can only be obtained from plants already operating. The excessive loss of experienced personnel acts to the detriment of safe operation of those plants. While some NRC officials have expressed concern in this regard, we are unaware of any change in the NRC policy or ACRS pronouncements.

We wish to point out that INPO, in cooperation with volunteering utilities with operating plants, is encouraging utilities with new plants to place employees in operating plants to gain experience. This program has not been successful, perhaps because of a perception that the NRC would not consider this appropriate operating experience. It is strongly recommended that the NRC confer with INPO on this matter and determine that a suitable period of recent on-shift experience in an operating plant is acceptable in resolving NRC concerns.

6. Stricter requirements to pass operator license examinations also discourage lower level operating personnel from seeking licenses and cause more attrition due to examination failures.

The pace of others attempting to recruit our personnel has dramatically escalated in recent months, in part caused by NRC activities already discussed. Comments in the July 1, 1981 issue of Energy Daily by former Chairman Hendrie commending PBNP personnel, while accurate, have caused intensified activity by recruiters soliciting the interest of our employees in other employment. This recruiting has taken many forms including activities which we consider to be highly improper. In fact, the conduct of some recruiters could readily be considered fraudulent.

While we have intensified training activities, including the initiation of a basic training program for inexperienced personnel, as already mentioned, the results and rewards of some of these activities will not be realized for several years. In

Mr. D. G. Eisenhut

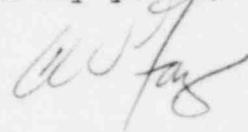
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the meantime, losses caused by recruiting or resignations, as discussed, or "bidding out", as allowed by labor contracts to other positions not requiring shift work or licenses, continue to occur. We have, of course, attempted to stabilize the situation by intensified legitimate recruiting and training, by increased staffing allowances, as mentioned above, and by improved wages and benefits, among other things. Thus, while we expect to meet our goals for increased staffing, the timing for final success cannot be specified. We will, however, keep you informed of our progress.

We will be pleased to provide any additional information you may require.

Very truly yours,



Assistant Vice President

C. W. Fay

Attachment

Copies to NRC Resident Inspector
J. G. Keppler, Region III
E. P. Wilkinson, INPO