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July 8, 1982  
MN-82-126

JHG-82-121

United States Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation

References: (a) License No. DPR-36 (Docket No. 50-309)  
(b) Letter from USNRC to MYAPCo dated June 15, 1982  
(Generic Letter 82-12)

Subject: Nuclear Power Plant Working Hours

Dear Sir:

In Reference (b) above, the USNRC transmitted to all licensees revised pages of NUREG 0737 that incorporates the Commission's policy on working hours. Reference (b) also requested licensees to review their past actions regarding development of a working hours administrative procedure, and the incorporation of that procedure into the administration section of the Technical Specifications.

Maine Yankee has developed an administrative policy which governs working hours, and establishes controls that provide assurance that, to the extent practicable, personnel will not be assigned to shift duties while in a fatigued condition that could significantly reduce their mental alertness or decision making ability. In addition, authorization of overtime under circumstances and at authority levels consistent with the Commission's policy are provided for. It will be reviewed to assure conformity with the Commission's policy statement (Reference (b)).

Maine Yankee prefers not to incorporate this policy into the administrative section of its Technical Specifications, at this time, for the following reasons:

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1. Revising the administrative section of the technical specifications to include limits and controls on overtime as specified in the Commission's policy statement would remove the flexibility necessary to implement the policy. Page three (3) of the revised pages of NUREG 0737, Section I.A.I.3. states..."Recognizing that very unusual circumstances may arise requiring deviation from the above guidelines, such deviations shall be authorized by the Plant Manager or his deputy, or higher levels of authority."

Policies are incorporated into the administrative section of the technical specifications when uniform implementation, with no room for flexibility, is desired.

When flexibility, as required in this policy, is necessary to allow for unusual circumstances, corporate policies and procedures are the more appropriate place to provide the required amount of control.

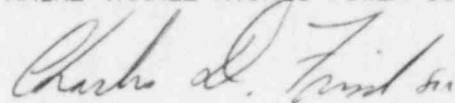
Any technical specification written to incorporate the Commission's policy, while retaining the needed degree of flexibility, would not, by definition, accomplish its purpose.

2. Generic Letter 82-12 (Reference (b)) revised Generic Letter 82-02 (February 8, 1982), which updated your letter of July 31, 1980, establishing interim criteria for shift staffing. If one were to anticipate further changes at this rate, there would be need for frequent revisions to the technical specifications, which would impose review fees upon us and the burden of preparation and review of these changes on both our staffs. We would prefer to forego this potential additional workload for the time being.

We trust this approach is satisfactory. Should you have any questions, please feel free to call us.

Very truly yours,

MAINE YANKEE ATOMIC POWER COMPANY



John H. Garrity, Senior Director  
Nuclear Engineering & Licensing

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