



CONNECTICUT YANKEE ATOMIC POWER COMPANY

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August 31, 1982

Docket No. 50-213
B10548

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Reference: W. G. Council letter to D. G. Eisenhut,
dated March 1, 1982.

Gentlemen:

Haddam Neck Plant
NUREG-0737 Item I.A.1.3, Shift Staffing

In the referenced letter, Connecticut Yankee Atomic Power Company (CYAPCO) expressed their intent to comply with the requirement to place two individuals with senior reactor operators (SRO) licenses on each shift by July 1, 1982 as required by the subject NUREG. CYAPCO is currently unable to fully meet this requirement due to a lack of licensed SRO's resulting from unexpected attrition, the current effort to provide college level technical training to SRO's, and the expected delay in the processing of the NRC examination results of the recent licensing school.

CYAPCO presently is using nine individuals for shift coverage in the Operations Department who hold senior reactor operator licenses and rotates them on a five shift rotation. CYAPCO normally utilizes six shift rotations but is presently using five shifts to support the SRO technical education upgrade school. Because of this, some of the shifts can only be manned with one SRO. CYAPCO is making every effort to schedule two SROs per shift with the available manpower. This is not always possible due to training, vacations, and other absences of SRO licensed personnel and overtime limitations.

For your information, four individuals have recently taken the NRC administered test for their SRO license and are waiting to receive the results of this test. It is envisioned that passing of the test by three of the four candidates will alleviate this temporary manpower shortage and permit assigning of two SRO's to each of five shifts. It is noted that two current SRO's are scheduled to be reassigned to other duties in the near future.

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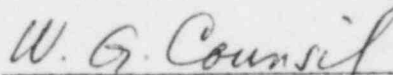
Should there be an unusually high failure rate in this last group of SRO candidates, CYAPCO would have to re-evaluate ability to comply with NUREG-0737 Item I.A.1.3. If this should be the case, CYAPCO will contact the staff to provide future plans for compliance.

In order to aid CYAPCO in meeting the desired shift staffing goal, the NRC is requested to expedite the test grading and license processing for the four CYAPCO SRO candidates.

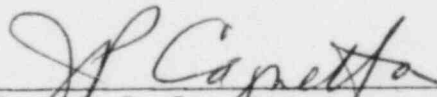
CYAPCO has also conducted a preliminary review of the proposed rule on Licensed Operator Staffing at Nuclear Power Units, and notes that it will not be possible to comply with its provisions on the schedule identified. We have been docketing correspondence on this subject since September of 1981 without any substantial feedback from the NRC Staff, and question the merits of promulgating regulations which cannot be met when adequate justification for an alternative has been provided. We intend to respond to Commissioner Asselstine's invitation for comments on the realism and workability of the proposed rule in our comments on the Federal Register notice.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY



W. G. Council
Senior Vice President



By: J. P. Cagnetta
Vice President
Nuclear and Environmental Engineering