



Northern States Power Company

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October 7, 1982

Director  
Office of Nuclear Reactor Regulation  
U S Nuclear Regulatory Commission  
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT  
Docket No. 50-263 License No. DPR-22

PRAIRIE ISLAND NUCLEAR GENERATING PLANT  
Docket Nos. 50-282 License Nos. DPR-42  
50-306 DPR-60

Implementation of NRC Guidelines for Working Hours

Guidelines for nuclear power plant staff work hours were provided in Generic Letter No. 82-02 dated February 8, 1982. In our letter dated June 4, 1982 we committed to implement the guidelines in Generic Letter 82-02 during plant operation by October 1, 1982 and submit a License Amendment Request with appropriate changes to the Technical Specifications by January 1, 1983. Generic Letter 82-12 dated June 15, 1982 transmitted a revised Commission policy on staff work hours to licensees. This revised policy explicitly stated that guidelines for work hours applied not only to periods of plant operation, but also to plant outages. In implementing the earlier guidelines contained in Generic Letter 82-02 we excluded plant outage periods. The purpose of this letter is to clarify our commitment to the guidelines to reflect the revisions contained in Generic Letter 82-12. In addition, we believe it is necessary to clarify our current practice with respect to relief of operators from control board duties.

The revised guidelines contained in Generic Letter 82-12 have been implemented at both plants with two exceptions:

72 hour/week limitation

We must routinely exceed the 72 hour/week work limitation during outages. All such cases will be reviewed and approved by the plant manager. However, we cannot claim that these exceptions to the 72 hour/week guideline are "usual circumstances" permitted by the guidelines.

With current staffing levels for licensed operators, the 72 hour/week guideline will be frequently exceeded during outages. Therefore we cannot, at this time, commit to a policy which limits work to 72 hours/week during outages except for unusual circumstances.

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Other Commission work guidelines (i.e. no more than 16 hours/24-hour period and no more than 24 hours/48-hour period) will be observed.


Relief from Control Board Duties

The revised guidelines state that "...procedures are encouraged that would allow licensed operators at the controls to be periodically relieved and assigned to other duties away from the control board during their tours of duty." We believe we now comply with the spirit of this guideline and see no need for procedures establishing definite, maximum, prescribed time limits for remaining in the control room or at the control board.

In practice, our operators do not stand in front of the control board continually scanning instrumentation. Operators move freely about the control room. It is our practice to have at least one additional operator over and above the minimum number of licensed operators required by the Technical Specifications. This "extra" operator is present specifically for relief purposes. Operators frequently go out into the plant to check equipment status and assist non-licensed operations personnel while on shift.

Therefore, we believe we satisfy the intent of this requirements by providing flexibility for operators to be relieved of control room duties at any time throughout their shift. A requirements for periodic relief of duties at established intervals would result in more "turnovers" each shift and reduce the continuity of the shift.

Please contact us if you have any questions concerning our implementation of the requirements of Generic Letter 82-12 at our plants or the alternative measures we have taken with respect to two of the Commissions' guidelines.



David Musolf

Manager of Nuclear Support Services

DMM/bd

cc: Regional Administrator-III, NRC  
NRR Project Manager, NRC  
NRC Resident Inspector  
G Charnoff