

NORTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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October 1, 1982

Docket No. 50-213

50-245

50-336

50-423

A02591

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

- References:
- (1) D. G. Eisenhut letter to All Licensees of Operating Plants, Applicants for an Operating License, and Holders of Construction Permits, dated June 15, 1982 (Generic letter 82-12)
 - (2) D. G. Eisenhut letter to All Licensees of Operating Plants, Applicants for an Operating License, and Holders of Construction Permits, dated February 8, 1982 (Generic letter 82-02)
 - (3) W. G. Council letter to D. G. Eisenhut, dated June 4, 1982.
 - (4) W. G. Council letter to the Secretary of the Commission, dated May 28, 1982.
 - (5) D. M. Crutchfield letter to W. G. Council dated, February 8, 1982.

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3
Generic Letter 82-12, Nuclear Power Plant Staff Working Hours
NUREG-0737 Item I.A.1.3, Shift Manning

References (1) and (2) requested Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) to revise the administrative procedures at the Haddam Neck Plant and at Millstone Unit Nos. 1 and 2 to incorporate the revised working hour guidelines and provisions for authorizing deviations from these guidelines. In Reference (3), CYAPCO and NNECO informed the Staff that the Haddam Neck and Millstone administrative procedures would be revised to incorporate these guidelines by October 1, 1982.

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CYAPCO Administrative Control Procedure ADM 1.1-65, Operations Department Shift Staffing Requirements applies these working hour guidelines to Senior Reactor Operators, Reactor Operators and Shift Technical Advisors. This was approved by the Staff in Reference (5). NNECO Administrative Control Procedure ACP 1.12, Scheduling of Station Personal Working Hours, makes this same application.

CYAPCO and NNECO's position, however, is that infrequent or short term deviations from these guidelines do not require approval of the plant superintendent or his deputy. Therefore, CYAPCO, in ADM 1.1-65, and NNECO, in ACP 1.12, have implemented the following guidelines for authorizing deviations:

The applicable Department Head, Duty Officer, Management Representative (NNECO only), or any Superintendent is required to authorize an individual to work more than 24 hours in any 48 hour period.

The Station Superintendent is required to authorize an individual to work more than 72 hours in any 7 day period.

All other deviations from the working hour guidelines may be authorized by the first level supervision.

ADM 1.1-65 and ACP 1.12 specifically note that the individual authorizing deviations to working hour guidelines should, through observations, discussion, or other means, ensure that the person(s) can satisfactorily perform the assigned tasks during the extended working hour periods. These procedures also require that if an individual is required to work in excess of the guidelines, his duties shall be carefully selected, and it is preferable that he not be assigned tasks that affect core reactivity or could possibly endanger the safe operation of the plant.

CYAPCO and NNECO conclude that these controls are adequate to meet the intent of Generic Letter No. 82-12 and NUREG-0737 Item I.A.1.3.

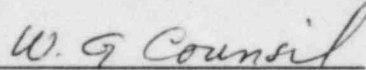
ACP 1.12 will also be used by Millstone Unit 3 when applicable.

Reference (1) also incorrectly stated that Reference (2) had requested revision of technical specifications to ensure following the policy guidelines. No such request has been received by either CYAPCO or NNECO. Furthermore, such a request would not conform to the intent of the Commission's proposed rule published in the Federal Register (47FR13369) regarding proposed changes to the technical specifications for nuclear power reactors. In Reference (4) Northeast Utilities Service Company (NUSCO) on behalf of CYAPCO and NNECO emphatically endorsed the concepts embodied in the proposed rule, expressing the view that the volume and complexity of the technical specifications has escalated to a level not conducive to focusing the attention of plant operators on matters of authentic safety significance. This view is still valid and applies here. Therefore, CYAPCO and NNECO have determined that changes to the Technical Specifications are not required.

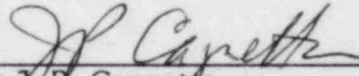
We trust the Staff will find the above information sufficient to resolve any concerns related to shift working hours.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
W. G. Council
Senior Vice President



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