



Wisconsin Electric POWER COMPANY
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U. S. NUCLEAR REGULATORY COMMISSION
 Washington, D. C. 20555

Attention: Mr. Samuel J. Chilk,
 Secretary of the Commission

Gentlemen:

(18)

DOCKET NUMBER
 PROPOSED RULE PR-50
 (47 FR 38135)

PROPOSED RULE 10 CFR 50
LICENSED OPERATOR STAFFING
AT NUCLEAR POWER UNITS

The subject proposed rule was published in the August 30, 1982 Federal Register. Wisconsin Electric Power Company wishes to offer the following comments related to proposals for staffing a two-unit, single-control room plant:

1. Control Room SRO Requirement

Wisconsin Electric has operated the Point Beach Nuclear Plant for over ten years. Our practice has been to strive to provide two individuals with Senior Reactor Operator (SRO) licenses per shift, as stipulated by the table in the proposed rule. There have, however, been occasions when only one SRO-licensed person (the Shift Supervisor) was on shift. This was an interim situation and came about because an individual holding a Reactor Operator license, who had recently been promoted to the management position of Operating Supervisor, had not had the opportunity to obtain an SRO license. Such an individual would expect to, and generally did, obtain his SRO at the next available opportunity. Important attributes of a Shift Supervisor or Operating Supervisor are competent leadership, technical knowledge, and operating experience. This position is in agreement with the statement in the proposed action that the intent of requiring an SRO-licensed person is to "assure that supervising and technical expertise is continuously available in the control room to respond to accident situations." The mere possession

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of an SRO license does not necessarily equate with possession of these other essential characteristics. Unless provisions are made for exceptions to the proposed staffing, however, an over-emphasis on possession of an SRO license could result. We, therefore, suggest that a note be added to the table in the proposed 50.54(m) (2) as follows:

Exceptions to these minimum requirements may be temporarily allowed if the licensee notifies the NRC of such exceptions and provides an acceptable plan for expeditious return to the minimum staffing requirements.

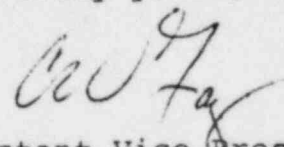
Please note that this comment is not in direct response to Commissioner Asselstine's request related to implementation because the situation of concern could occur at any future time, even if compliance is achieved by January 1, 1983.

2. Reactor Operators

The minimum staffing table in proposed 50.54(m) (2) requires three licensed operators for a two-unit, single-control room plant, even if one unit is shut down. Thus, no reduction is permitted from the requirements for a two-unit, two-control room plant under the same conditions, nor is any reduction permitted from a two-operating unit situation. In our opinion, one operating unit requires more continuous monitoring than a shut-down unit, and some relaxation from the requirements for two operating units is appropriate. We, therefore, recommend that the table be modified to indicate a two-operator requirement for a two-unit, one-control room plant when only one unit is operating since supervision, plus the second licensed operator in the control room, can provide necessary surveillance and control manipulation during a shut-down situation.

We appreciate the opportunity to comment on this proposed rule and hope that our comments are considered in an effort to minimize adverse impacts on the industry caused by excessive requirements for numbers of licensed personnel.

Very truly yours,



Assistant Vice President

C. W. Fay

Copy to NRC Resident Inspector