

YANKEE ATOMIC ELECTRIC COMPANY



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2.C.2.1.
FYR 82-100

October 8, 1982

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

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

References: (a) License No. DPR-3 (Docket No. 50-29)
(b) USNRC Letter to All Operating Plant Licensees, dated
June 15, 1982 (Generic Letter 82-12)

Subject: Nuclear Power Plant Working Hours

Dear Sir:

In Reference (b), revised pages of NUREG-0737 were transmitted that incorporate 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.

An administrative policy has been developed at Yankee 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 has been reviewed to assure conformity with the Commission's most recent policy statement [Reference (b)].

Incorporation of this policy into the administrative section of the Technical Specifications, however, is not desired for the following reason:

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 Management 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.

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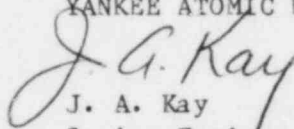
When flexibility, as required in this policy, is necessary to allow for unusual circumstances, corporate policies and procedures are the more appropriate place to provide the required amount of control.

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

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

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



J. A. Kay

Senior Engineer - Licensing

JAK/dd