

EXHIBIT A

Prairie Island Nuclear Generating Plant
License Amendment Request dated January 14, 1983

Proposed changes to the Technical Specifications
Appendix A of Operating Licenses DPR-42 and DPR-60

Pursuant to 10CFR 50.59 and 50.90, the holders of operating licenses DPR-42 and DPR-60 hereby propose the following changes to Appendix A, Technical Specifications.

Specification: Overtime Requirements - TS 6.1

1. Proposed Change

See attached Exhibit B

Reason for Change

The change implements the requirements of NUREG-0737, Item I.A.1.3.

Safety Evaluation

The control of overtime hours we have proposed meets the intent of the original NRC's request while allowing for continuity of work, judicious use of experienced personnel, good planning, and efficient scheduling.

2. Proposed Change

Delete the word plant from T.S.6.1-E

Reason for Change

Fire Brigade training is not the direct responsibility of the plant. It is conducted by the Production Training Department.

Safety Evaluation

None is required because the change is administrative in nature.

EXHIBIT B

License Amendment Request dated January 14, 1983

Exhibit B, attached, consists of the following revised pages for the Appendix A Technical Specifications which incorporate the proposed changes.

Pages

TS 6.1-2

TS 6.1-3 (new page)

- D. Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Superintendent Radiation Protection who shall meet or exceed the qualifications of Regulatory Guide 1.8, September, 1975, and (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents. The training program shall be under the direction of a designated member of Northern States Power management.
- E. A training program for the fire brigade shall be maintained under the direction of a designated member of Northern States Power management. This program shall meet the requirements of Section 27 of the NFPA Code - 1976 with the exception of training scheduling. Fire brigade training shall be scheduled as set forth in the training program.
- F. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel. Procedures shall include the following provisions:
1. Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:
 - a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
 - b. Overtime should be limited for all nuclear plant staff personnel so that total work time does not exceed 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, not more than 84 hours in any seven day period, all excluding shift turnover time. Individuals should not be required to work more than 15 consecutive days without two consecutive days off.
 - c. A break of at least eight hours including shift turnover time should be allowed between work periods.
 - d. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

- e. Shift Technical Advisor (STA) and Shift Emergency Coordinator (SEC) on-site rest time periods shall not be considered as hours worked when determining the total work time for which the above limitations apply.
2. Any deviation from the above guidelines shall be authorized by the Plant Manager or designee, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. During plant emergencies the Emergency Director shall have this authority. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not allowed.