



PSEG Public Service
Electric and Gas
Company

80 Park Plaza, Newark, NJ 07101 / 201 430-7000 MAILING ADDRESS / P.O. Box 570, Newark, NJ 07101

(24) September 30, 1982

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

Mr. Samuel Chilk
Secretary to the Commission
US Nuclear Regulatory Commission
Washington, DC 20555

Attn: Docketing and Service Branch

Dear Mr. Chilk:

10CFR50-LICENSED OPERATOR STAFFING
AT NUCLEAR POWER PLANTS
PROPOSED RULE (47FR38135)



We have reviewed the proposed rule and offer the following for consideration.

The proposed rule requires three licensed Senior Reactor Operators, (two Senior Operators and one Shift Supervisor), to be on shift at a two unit plant with two control rooms. The rule should be changed to require only two licensed Senior Reactor Operators (one Senior Operator and one Shift Supervisor) for the following condition:

When two control rooms for a two unit plant are in close proximity, with both control boards visible from each room, one Senior Operator (SRO), licensed on both units, should be sufficient to meet the minimum shift requirements. Based upon close proximity, clear line of sight visibility, and quick access, such dual control rooms can be treated as a common control room for both units, thereby requiring only one Senior Operator (SRO) in the control room area in addition to the shift supervisor (SRO).

PSE&G control room areas are configured in this manner and we have found that one Senior Operator (SRO) can adequately supervise and support the activities in both control rooms. This is analagous to note 3 included with the minimum staffing table attached to the proposed rule.

The NRC staff has determined that this staffing is acceptable with such control room area configurations.

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Acknowledged by card. 10/18/82 emg

DBW The Energy People
add: E Mueschoff
5650 NL

Mr. Samuel Chilk

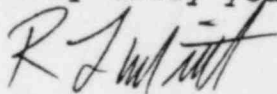
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In addition, PSE&G endorses the comments submitted by KMC on behalf of the Qualifications of Reactor Operators Utility Group.

We appreciate the opportunity to comment on this important issue.

Very truly yours,



R. L. Mittl
General Manager -
Corporate Quality Assurance

CWV/EAL:cag

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POWER AUTHORITY OF THE STATE OF NEW YORK

10 COLUMBIA STREET NEW YORK, N. Y. 10019
USNRC (212) 397-6200

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September 30, 1982

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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(47 FR 38135)

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Attention: Docketing and Service Branch

Subject: NRC Proposed Rule: Licensed
Operator Staffing at Nuclear
Power Plants

Dear Sir:

The subject proposed rule was noticed in the Federal Register on August 30, 1982, 47 Fed. Reg. 38135. The Power Authority of the State of New York appreciates this opportunity to comment on the proposed regulations and recommends the following revision:

Section 1(iv) should be revised to read:

The Director of Nuclear Reactor Regulation may grant requests for extensions of the deadline to [July 1, 1983] January 1, 1984, if the requests are timely and demonstrate good cause. In exceptional cases, the Commission itself may grant extensions beyond [July 1, 1983] January 1, 1984.

Bracketed words deleted. Underscored words added.

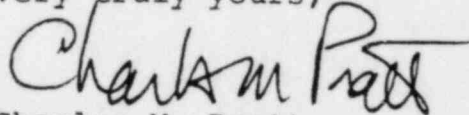
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add: E. Menschoff
2650 NW

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Secretary of the Commission
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The revision of the dates provides the Director of Nuclear Reactor Regulation with the flexibility to analyze a majority of the requests for extensions thus eliminating duplicative requests by licensees and providing efficient use of staff resources. While the Authority believes that, for the most part, the requirements of the regulations can be met by January 1, 1983, the majority of any extension requests will involve six months to one year. The proposed revision therefore allows the Commission to more fully utilize the services of staff but does not change the substantive requirements of the regulation, i.e. that the staffing levels be met by January 1, 1983 unless good cause for an extension is demonstrated.

Very truly yours,



Charles M. Pratt
Assistant General Counsel

mn