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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH *emp*

Secretary of the Commission
U S Nuclear Regulatory Commission
Washington, DC 20555

DOCKET NUMBER
PROPOSED RULE PR-50
(26)
(47 FR 38135)

Attention: Docketing and Service Section

Northern States Power Company appreciates the opportunity to review and comment on the proposed revision to 10 CFR Part 50 related to Licensed Operator Staffing at Nuclear Power Units published in the Federal Register on August 30, 1982.

We have the following comments to offer:

Requirement for Senior Reactor Operator (SRO) in Control Room

The proposed rule will require the presence in the control room at all times of a person holding a senior operator license for each unit which is above cold shutdown.

At our Monticello plant (and several other plants), the Shift Supervisor's office is not located in the control room. This individual will hold one of the two SRO licenses required during plant operation. The Shift Supervisor's office is located immediately adjacent to the control room and transit time between the two areas takes less than ten seconds. Redundant communication channels are available between the two areas. We believe the rule should recognize such arrangements as being equivalent to having an SRO located in the control room.

We have long recognized the advantages of locating the Shift Supervisor's office outside of the control room (for example, reduction in traffic into and out of the control room resulting in fewer distractions to the control room operators). For smooth and efficient plant functioning, the Shift Supervisor must be easily accessible and spend most of his time in his office. The second SRO required by the rule should be free to move throughout the plant for routine inspections and evaluation of off-normal events.

Deadline for Meeting Requirements of Rule Relating to Two SRO's on Shift

The proposed rule has an implementation date of January 1, 1983. It would allow the Director of Nuclear Reactor Regulation to grant requests for extensions of the deadline to July 1, 1983, if the requests are timely and demonstrate good cause. In exceptional cases, further extensions may be granted by the Commission itself. We believe the January 1, 1983 deadline is unrealistic and the extension policy contained in the proposed rule is not liberal enough.

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Acknowledged by card 10/22/82 emp

NORTHERN STATES POWER COMPANY

Secretary of the Commission

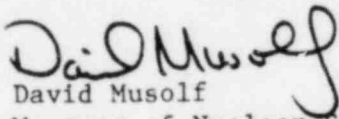
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The requirement for two SRO's on shift is an especially difficult one for a one-unit plant site to meet. At our Monticello plant we initiated steps long ago to increase the number of licensed and senior licensed operations personnel in conjunction with implementation of Item I.A.1.3.2 of NUREG-0737. On February 5, 1982 we requested an extension in the implementation schedule for Item I.A.1.3.2 until February 15, 1983 to train and license additional senior licensed personnel. In spite of good faith efforts, our goal of two SRO's per shift has not yet been met and we now believe an additional schedule extension request will be necessary.

We believe the proposed rule underestimates the difficulty involved in selecting, training, and licensing personnel. At a time when licensing requirements are becoming more rigorous and experienced personnel are in short supply, more training and preparation are necessary for license candidates. The final rule should recognize this fact and contain a realistic implementation date for the shift manning requirements. January 1, 1984 would be a realistic implementation date.

Please contact us if you have any questions concerning our comments related to the proposed licensed operator staffing rule.



David Musolf

Manager of Nuclear Support Services

DMM/bd

cc: Regional Administrator-III, NRC
NRR Project Managers, NRC
NRC Resident Inspectors
G Charnoff