



December 28, 1990

LU 721

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Dear Gentlemen:

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|----------------------------|---|--------------------|
| In the Matter of |) | TVA-SQN-TS-90-22 |
| Tennessee Valley Authority |) | Docket Nos. 50-327 |
| | | 50-528 |

Reference: SEQUOYAH NUCLEAR PLANT (SQN) - TECHNICAL SPECIFICATION (TS) 90-22

I have just reviewed the proposed TS change 90-22 that US-TVA has submitted for the Nuclear Regulatory Commissions approval. I represent Local 721 of the International Brotherhood of Electrical Workers. This group of employees would be effected directly by the unilateral implementation of Insert A into Section 6.2.2 FACILITY STAFF subsection g. I find it most vexing that either TVA or the NRC would attempt to circumvent a negotiated agreement that was negotiated in good faith some 10 years ago. (Refer to Attachment A).

I have reviewed the NRC Generic Letter (GL) 82-16 and can find no requirement that would force either TVA or the NRC to require a violation of Attachment A. The word SHOULD is addressed throughout GL-82-16, except where it addresses Plant Management authorization to deviate from the GL-82-16 guidelines.

SQN failed to fill the forms out to get Plant Management approval on several occasions during the past two or three years. This is a management problem; however, with the TS change 90-22 it will then become a problem of the IBEW and those that are represented by them. I believe that TVA has fallen short, very short in meeting their obligations to negotiate a change to Attachment A prior to the TS change taking place.

TVA has failed in requesting any meeting to change this negotiated agreement. This is another example of the management style at US-TVA nuclear power. They believe that they can do whatever they wish, whenever they wish.

TVA has attempted to change the schedule that the operators work (SIX Group Rotation) unilaterally and were sent back to the drawing board. Sequoyah management and I are presently negotiating a 12 hour, 5 group rotation in an attempt to resolve the problem. However, I am having a hard time maintaining an objective view with this issue being forced on us.

I would request that I be given the chance to address this issue with the NRC Staff prior to its approval. I would be willing to meet on any day that is acceptable to the staff.

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If Attachment A was to be reviewed by the staff prior to the TS change 90-22, it would be noted that it insures that all rotating shift personnel are treated equal and the only person required to work 16 hours in any given day is the volunteer or the person who has worked the least amount of overtime over the past year. This is acceptable to the shift workers and meets the intent of GL 82-16.

Attachment A and its use as a means for distributing overtime equally among the qualified employees is fair and until it is changed through collective bargaining US-TVA should not get GL 82-16 added to the TS via TS change 90-22.

I can be contacted either at home at 615-842-9149 or at work at 615-843-7488.

Very truly yours,

James T. Springfield
Business Manager
IBEW Local 721
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Soddy Daisy, TN 37379

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LU 721

NRC Resident Inspector
Sequoyah Nuclear Plant
2600 Igou Ferry Road
Soddy Daisy, TN 37379

Mr. B. A. Wilson, Project Chief
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

ATTACHMENT A

June 24, 1980

Mr. M. C. Hargett, Secretary
Tennessee Valley Trades and Labor Council
Room 214
5700 Brainerd Road
Chattanooga, Tennessee 37411

Mr. Allen Wilson, Director
Labor Relations Staff
211 Miller's Building
Knoxville, Tennessee 37902

Gentlemen:

The International Representative of the International Brotherhood of Electrical Workers, H. F. Grovenstein; local union representatives; management, represented by T. H. Cash; and other management members met for the purpose of reviewing a procedure developed on March 14, 1979, and implemented on May 21, 1979, to provide a uniform method of filling and recording overtime shifts for operating employees on continuous shifts.

Attendance:

For TVA:

T. H. Cash
E. E. Cabaniss
J. C. Hammon
Lee Holliman
Jerry Olson
J. B. Sandefur
W. H. Thompson

For IBEW:

H. F. Grovenstein
Jerry D. Duncan
Charles W. Golden
Tom King
Charles A. Roper
John Schmitz
John Taylor
Charles D. Treece

The procedure was revised. The revised procedure, which was implemented in the Division of Nuclear Power on April 7, 1980, and in the division of Fossil and Hydro Power on April 14, 1980, is described below:

Procedure

To provide uniformity in filling operator overtime shifts. These shifts will be filled in the order listed below.

1. Employees in classifications in which the overtime shift is to be worked will be scheduled or called on their offdays in order of their overtime hours, provided it will not require that they work 16 consecutive hours.

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2. In the event that no one is available in group 1 above, employees in classification who have had one 8-hour off shift and who will not have to work 16 consecutive hours will be scheduled or called in order of their overtime hours to fill the vacant shift.
3. In the event no one is available in groups 1 or 2 above, employees on shift in classification who are working overtime on their offdays will be called in order of their overtime hours to work the shift.
4. Employees on shift in classification will be offered the vacant shift in order of overtime hours.
5. In the event no one is available in groups 1-4 above, the employee low on overtime on shift in classification who is not on overtime will be held over to fill the overtime vacancy. Normally, an employee will not be required to double over 16 hours more than every other day.
6. If the employees held over request relief, the employees on the incoming shift in classification will be called at home.

Recording Overtime

1. Records of paid overtime worked or refused shall be kept by management in each plant on a biweekly basis and shall be made available upon request to labor representatives.
2. Overtime hours shall, for recording purposes, be shown in time paid for--(example): one and one-half (1-1/2) hours for each hour worked, or four hours worked will be recorded as six hours. Double time (2) shall be recorded as two times for each hour worked; or four hours worked shall be recorded as eight hours.
3. On the plant records, hours worked will be preceded by the letter "W;" hours refused will be preceded by the letter "R." These records are retained in accordance with applicable law.
4. Overtime refused is not considered in determining overtime hours.
5. Employees who are hired or transferred between locations will assume an amount of overtime equal to the average overtime of the new classification and location. Reclassified employees at the same location will retain their accumulated overtime hours.
6. Employees shall not be charged with overtime while on annual or sick leave.
7. Overtime hours will be zeroed for all employees at the end of the pay year.

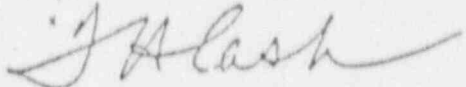
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8. Employees in temporary classification will be considered as permanent employees in classification for the purpose of overtime distribution.

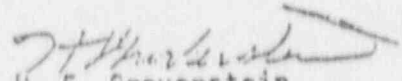
Procedure Review

1. This procedure will be reviewed after a period of 6 months.

Very truly yours,



T. H. Cash, Manager of
Labor Relations, Office of Power



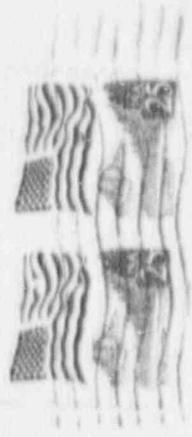
H. F. Grovenstein
International Representative, IBEW

THC:DI

cc: ARMS, 640 CST2-C
E. E. Cabaniss, Paradise Steam Plant
Jerry D. Duncan, Waverly, Tennessee
Charles W. Golden, Gallatin, Tennessee
J. C. Harmon, Gallatin Steam Plant
Lee Holliman, 1003 EB-C
Tom King, Paducah, Kentucky
Jerry Olson, 1710 CST2-C
Charles A. Roper, Bridgeport, Alabama
J. B. Sandefur, 1003 EB-C
John Schmitz, Decatur, Alabama
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