

Attachment A

1. Remove page 6-4
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TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION#SINGLE UNIT FACILITY

LICENSE CATEGORY QUALIFICATIONS	APPLICABLE MODES	
	1, 2, 3 and 4	5 and 6
SRO*	2	1**
RO	2##	1
Non-Licensed Auxiliary Operator	2	1
Shift Technical Advisor	1	None Required

* Includes the licensed Senior Reactor Operator serving as the Shift Supervisor.

** Does not include the licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling, supervising CORE OPERATIONS.

Shift crew composition may be one less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

Prior to December 1, 1983, 1 (one) Reactor Operator may fulfill this requirement if necessary in order to fully comply with the restrictions on work hours as specified by the NRC Policy on overtime.

Attachment B

Proposed Technical Specification Change No. 82 revises the requirement for two (2) Reactor Operators to be on shift in applicable Modes 1, 2, 3 and 4. This change allows for one (1) Reactor Operator to be on shift if necessary in order to fully comply with the restrictions on work hours as specified by the NRC policy on overtime. With this change in effect, a non-licensed individual under the supervision of a licensed Senior Reactor Operator could manipulate controls that do not directly affect the reactivity of the reactor. This reduced shift requirement would be in effect until the next licensed operators are qualified during 1983. The objective of this change is to prevent excessive overtime for operating personnel. A Senior Reactor Operator or another Reactor Operator will relieve the Reactor Operator when necessary so that there will always be a qualified licensed operator to make reactivity changes with a minimum of three licensed individuals per shift. The normal shift complement for fire brigade and EPP functions will be maintained as required.

The NRC published a proposed rule (FR Vol. 47, pp 38135) which would establish under 10 CFR 50.54 the requirement that two (2) licensed reactor operators be on shift while the unit is being operated. The purpose of the second reactor operator is to make relief available to the reactor operator at the controls and to perform other assigned duties such as conducting valve lineup checks, taking routine tours, and investigating problem areas. Since a licensed Senior Reactor Operator is authorized and capable of providing relief to the Reactor Operator assigned to the controls and since non-licensed operations personnel are capable of performing other operations duties while under the direct supervision of a Senior Reactor Operator except manipulation of controls which directly effect the reactivity of the reactor, the relief requested by this proposed Technical Specification Change does not increase the probability of an accident nor the consequences of an accident nor create the possibility of an accident different from those analyzed in the FSAR. The margin of safety as defined in the basis for any Technical Specification is not reduced.

The proposed rule (10 CFR 50.54) sets forth criteria by which exemption from the January 1, 1983 deadline will be granted. These criteria are:

- 1) The licensee is committed to hire and train the necessary number of operators.
- 2) The licensee has set a reasonable target date by which it would meet the requirements.
- 3) The licensee has an active recruitment program to hire the necessary number of operators.
- 4) The licensee has an adequate training program to assure that it has well trained operators readily available.

Duquesne Light Company has over 60 trainees now in training for licensed operator functions. The Company expects that the relief from the requirement to maintain two licensed reactor operators on shift while the plant is operating will not be required beyond December 1, 1983. The Company has an adequate training program to provide the necessary number of licensed personnel. Therefore, the Company meets the requirements for extension of the deadline to the proposed rule under 10 CFR 50.54.

The OSC and ORC have reviewed this proposed change and, based on the above safety evaluation, it is concluded there is reasonable assurance that the public health and safety will not be endangered by operation in the proposed manner.