

December 18, 1981
LLL 368

Mr. Thomas M. Novak
Assistant Director for Operating Reactors
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Novak:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
TMI-1 Shift Manning

This letter is in response to your letter Docket No. 50-289 of December 1, 1981, in which you requested that we provide our proposed operator staffing plan for TMI-1. Our letter LLL 356 of December 3, 1981, provided the information requested concerning shift staffing prior to restart. This letter outlines our plans for restart and continued operation at power.

Our long term goal and current planning are directed towards regaining capability to have a six-shift rotation. The loss of seven licensed operators (four RO's and three SRO's) in the last year has us currently in a situation where we have the capability for staffing five shifts consistent with the shift manning commitments set forth in ASLB's Partial Initial Decision of August 27, 1981. We can and will at all times meet or exceed our Technical Specification requirements for shift manning and the license manning conditions for the operation of TMI-1 as set forth in the ASLB Partial Initial Decision on Management Issues. We will also continue to comply with the Staff Guidelines on overtime and training requirements.

The NRC oral and written re-examination of operators who failed one or more sections of the RO or SRO examinations administered in October is now scheduled for the week of February 8, 1982. Our staffing plan must therefore be shown as two separate plans; one for startup before the re-examinations are administered and graded, and a second based on operations after the re-examinations.

Licensed Operator Manning Plan Before Re-Examination

There are currently 21 individuals licensed as either RO or SRO as a result of the October NRC License examinations. Some of these individuals are not normally shift operating personnel, but are filling other positions in plant

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management, training and as an STA. A specific program for ensuring non-operations department licensed personnel are fully aware of current plant status and operation, which will include instructional watches, will be conducted. This potentially includes three individuals from the Training Department, who were licensed operators prior to assignment to the training department, and one STA. These individuals will also be assigned on-shift with our more knowledgeable and experienced SRO licensed shift supervisors. This additional training is not necessary for the two SRO licensed individuals from plant management as they are deeply involved in plant operations on a day-to-day basis, and are well versed on plant status and conditions. Shown below is the status of the currently licensed personnel.

	<u>SRO</u>	<u>RO + Trained as SRO</u>	<u>RO</u>
Normal Shift Operating Staff	4	2	9
Others	6	0	0
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TOTAL	10	2	9 = 21

It may also be desirable during this period to alter our shift manning for short periods of time (less than 10 days) and have licensed operators working, in effect, a four shift rotation.

Licensed Operator Manning Plan After Re-Examination

Training has commenced for those operators who failed the October examination. Of those who failed, four will not be recommended for re-examination in February. We do anticipate recommending three RO's and five SRO's for the February re-examination. Shown below is the status of Licensed personnel, assuming all these individuals pass their examination.

	<u>SRO</u>	<u>RO + Training as SRO</u>	<u>RO</u>
Normal Shift Operating Staff	9	0	12
Others	6	0	0
	<hr/>		
TOTAL	15	0	12 = 27

After the examination results are available we will restructure our shift manning to minimize the use of non-operating staff personnel.

The following steps are being taken to insure we achieve our goal of a six-section rotation and that appropriate and adequate training is maintained:

- The training week as part of the shift rotation will be retained. To reduce from six to five section, we have eliminated the relief week from the shift rotation which are normally assigned to the 0700-1500 shift. This will insure that continuity and adequacy of training is maintained.
- An additional five RO trainees from the operations department will have completed their training program in time to permit them to take the NRC RO examination during the week of February 8, 1982 and simulator examinations scheduled in March. These 5 will be in addition to the 12 in the above tabulation.
- About four auxiliary operators will enter the RO training program in January 1982.
- About seven new hires will enter the RO training program in February or March 1982.
- About four RO's will enter the SRO training program early in the year. This program is designed to take six months. We have budgeted for seven shift supervisors and seven shift foremen, for 1982 and will make every effort to achieve this number.
- The operator training staff will be augmented by either internal or external resources to assure that use on shift of licensed members of the Training Department staff does not have an unacceptable affect on the training program implementation.

Based on the above, I consider that TMI-1 has adequate licensed personnel to safely restart and operate the Unit and that every reasonable effort is being taken to achieve the desired six section rotation in a timely manner.

Sincerely,

H. D. Hukill for
H. D. Hukill
Director, TMI-1

EDH:WJM:vjf

cc: Mr. Paul F. Collins

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Special Master

In the Matter of)
)
METROPOLITAN EDISON COMPANY) Docket No. 50-289 SP
)
(Three Mile Island Nuclear) (Restart)
Station, Unit No. 1))

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