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September 20, 1982

DIRECTOR OF NUCLEAR REACTOR REGULATION
ATTENTION JOHN F STOLZ CHIEF
OPERATING REACTORS BRANCH 4
U S NUCLEAR REGULATORY COMMISSION
WASHINGTON DC 20555

DOCKET 50-312
RANCHO SECO NUCLEAR GENERATION STATION
UNIT 1
ADDITIONAL INFORMATION ON NUREG 0737
ITEMS I.A.1.3 AND II.B.2

In response to your September 13, 1982, telephone calls regarding the status of several NUREG 0737 items, we wish to provide additional information on two specific items. These are I.A.1.3, Shift Manning and II.B.2, Design Review of Plant Shielding.

Regarding the shift staffing criteria of NUREG 0737 Item I.A.1.3, you expressed concern over our June 4, 1982, submittal which stated that the District would be unable to meet the recommended staffing levels until approximately 1985. We pointed out that this position was the same as the District had expressed in our November 3, 1980, and February 11, 1982, submittals on this subject. You then informed us of a proposed rule change to 10 CFR 50.54 which would require that the NUREG 0737 recommended staffing levels be in place by January 1, 1983 (with a provision for a brief deadline extension). It was suggested that the District explain and document our difficulties in complying with the staffing levels and explain any compensatory measures we have taken or could take to bolster staffing.

As explained by Mr. Oubre' in one of the September 13 telephone conversations, our past submittals have given two schedules for achieving the recommended staffing levels of two SROs and two ROs per shift. The first schedule (November, 1983) is considered optimistic because it assumes no attrition of personnel, and the second schedule (June, 1985) is considered more realistic because it assumes a 30% attrition rate. Although our current staffing situation indicates that we are closer to the optimistic schedule than the schedule with attrition, we have no confidence that the District will be able to maintain this situation. Many of our licensed operators are being recruited actively by hiring firms representing other utilities. What is particularly distressing to the District is that several of the investor-owned utilities have raised their salaries for licensed operators to 15-30% above those offered by the District, and the license bonus offered by one investor-owned utility in our area now exceeds the District's bonus by approximately 43%. Since the District is municipally owned, it has

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many of the same fiscal restraints and public responsibilities that U.S. Government organizations face with respect to employee salaries and benefits.

The numerous NRC recommendations on staffing, training and overtime have caused an extreme demand for licensed operators, but the NRC fails to recognize that operating personnel cannot be licensed overnight. The NRC guidance is, in effect, promoting piracy within the industry, and the District believes this to be counterproductive to safety since piracy of licensed personnel actually decreases the supply of licensed operators at U.S. Nuclear power stations. Not only do many of these individuals leave the utility industry, many that join other utilities do so in nonshift operations capacities. Even those licensed personnel who join a new utility to remain in shift operations are removed from licensed duty for one to two years while they train and license on the new facility.

The District is limited in the number of personnel which can be licensed in a given period of time. Historically, the District's Operator Licensing Program has been deliberate and extensive. Normally, a qualified candidate spends a minimum of eighteen to twenty-four months as an unlicensed operator in the plant prior to beginning reactor operator training. The license training program then takes approximately sixteen months to complete. In addition, the NRC has imposed a one year experience requirement as a licensed reactor operator prior to taking the Senior Operator Examination, and the District's upgrade training program for Senior Operator requires approximately seven months. Candidates put up for licensing by the District have been 100% successful in passing the NRC examination on the first attempt under the post-TMI 80%-70% criteria. This is in stark contrast to the experience of many other utilities. We firmly believe that any attempt to speed up the District program can only lend to adverse safety implications for the General Public.

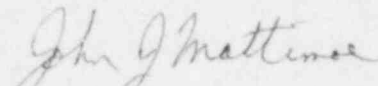
IE Circular No. 80-02, of February 1, 1980, established overtime guidance to assure that operating personnel are physically prepared to stand a competent duty. The District, as a result of this guidance, has committed to establish a six-shift rotation to minimize overtime and, in particular, to eliminate the requirement to conduct training on an overtime basis. As a result of industry's commitment to INPO, the required operator requalification program has expanded making the non-overtime training goal even more important. This commitment to six shifts was enhanced by INPO comments resulting from the 1981 audit and more recently by an outside consultant review conducted as a commitment given to the NRC Regional Director during an enforcement conference. This six-shift rotation commitment would have to be delayed for many months if a requirement is made to increase the licensed operator staffing per shift in 1983.

Discussions with other utilities indicate that many other plants would have to meet the increased shift staffing by scheduled overtime and by less than six shift rotations. In light of industry experience and IE Circular No. 80-02, this action seems contrary to the best interest of safety.

Amendment No. 31 to the Rancho Seco Operating License prescribed in the Technical Specifications that a Shift Technical Advisor (STA) be available to shift crew personnel. The District has embarked on a training program to license Shift Technical Advisors currently on the staff. This program, voluntary in nature, is being pursued as a means of strengthening the overall capability of the operating crew and support staff. Two of the District's STAs are currently licensed as Reactor Operators and four others are in training with an anticipated licensing date of March 1, 1983. We believe that the availability of these personnel partially compensates for the shortage of licensed operators which would be needed to meet the NUREG 0737 recommendation.

Regarding the plant shielding design review, NUREG 0737 Item II.B.2; there is only one hardware change needed as a result of that review. This involves the addition of motor operators on two redundant valves in the decay heat return line from the hot leg which could be needed in order to proceed with long term decay heat removal system operation following a degraded cooling event. This modification is needed because the dose rate in the decay heat room is high enough to preclude personnel access to the valves when the NUREG 0737 Item II.B.2 source term is assumed. We have determined the dose rate to be well in excess of 1,000 rem/hour when access would be needed. However, this dose rate is extremely unlikely to occur since no credible accident would be expected to produce dose rates of this magnitude. If credible accident dose rates are estimated, the dose rate would be approximately 38 rem/hour (Updated Safety Analysis Report, paragraph 14.3.8.4) when access to the area would be required. This dose rate would allow approximately eight minutes to open one of the valves before the dose received equals five rem. This time is considered ample to accomplish the required task. Due to the extremely low probability of an occurrence yielding the NUREG 0737 source term, we feel that continued operation is justified until the new motor operators are installed. Installation of the two valve operators is planned for the next refueling outage (subject to equipment delivery) which is scheduled to begin in January, 1983.

If you desire further information, please do not hesitate to contact the District.


John J. Mattimoe
General Manager