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SENIOR VICE PRESIDENT
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September 27, 1983

BECO 83-244

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

License No. DPR-35
Docket No. 50-293

Subject: Shift Manning (TMI I.A.1.3)

- References: (A) Boston Edison letter from Mr. W.H. Deacon to Mr. D.B. Vassallo, dated February 15, 1982.
- (B) Boston Edison letter from Mr. W.H. Deacon to D.G. Eischhut, dated September 2, 1982.
- (C) Boston Edison letter from Mr. A.V. Morisi to Mr. D.B. Vassallo, dated December 9, 1982.

Dear Sir:

In the Federal Register (FR) of July 11, 1983, the final rule concerning shift manning was promulgated. This rule states that unless an extension is submitted which satisfies the five criteria contained in the notice, licensees will be expected to be in compliance by January 1, 1984.

Pursuant to 10CFR50.12, Boston Edison Company herein requests an extension to April, 1984. This is a restatement of our previous commitment transmitted in our letter of December 9, 1982 (Reference (C)). As justification for granting this request we have provided below both a summary of our past correspondence, which reflects our early, voluntary commitment to the intent of the rule, and a section that directly addresses the specific criteria of the FR notice.

Past Correspondence

In our letter of February 15, 1982 (Reference (A)), we requested a twelve week extension because the refueling outage and NUREG-0737 tasks had adversely affected the ability of the operator candidates to sufficiently prepare for the exam. This letter requested September, 1982 as the date of implementation.

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The September, 1982 date was extended to December 17, 1982. This was requested in our September 2, 1982 letter (Reference (B)). This delay resulted from our incorrect assumption that exam results would be received in a 2 week period, whereas a 90 day period was actually required. In addition, this letter introduced the possibility that attrition, caused primarily by early retirements, might make the December implementation impossible.

In our letter of December 9, 1982 (Reference (C)), we requested an extension to April, 1984. This extension was dictated by the unanticipated high failure rate of our license candidates. We also committed to retain the existing five-shift rotation, and to effect the manning requirements as allowed by the availability of licensed personnel. The April date was determined by a schedule which incorporates lessons learned from our past efforts.

We believe a review of this correspondence indicates a concerted effort toward voluntarily implementing the Item I.A.1.3 guidelines, the completion of which was delayed by reasons generally beyond our control.

Criteria

Criterion 1: Is the licensee firmly committed to hire and train the necessary number of operators?

We believe the chain of past correspondence described above demonstrates our commitment to hire and train sufficient personnel to meet the requirement. In addition, our letter of December 9, 1982 expressly states:

"We wish to emphasize, and we believe our past actions and submittals demonstrate, that we have in good faith attempted to recruit, train, and license the necessary complement of personnel to comprehensively satisfy the guidelines of Item I.A.1.3."

Criterion 2: Has the licensee set a reasonable target date?

Our target date extends four months beyond that set by the rule. This seems insignificant considering the length of time this issue has been in progress.

Criterion 3: Is there an active recruitment program?

Such a program is implied by our past correspondence, and is expressly stated by the portion of the December 9, 1982 letter quoted above in addressing Criterion 1.

Criterion 4: Does the licensee have an adequate training program to assure it has well-trained operators?

We have developed a large, well equipped training force to train operators. We are confident of the ability and quality of our training, and believe we will have sufficient candidates trained and licensed by April to satisfy Item I.A.1.3.

BOSTON EDISON COMPANY

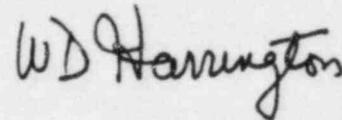
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Criterion 5: Will implementation of the rule adversely affect the training program, overtime practices, number of shifts, or length of shifts?

In our December 9, 1982 letter we said we would deploy our current personnel resources in a "...best effort to meet the intent of the NUREG for most shifts until adequate licensed personnel exist." To do otherwise now would mandate scheduling that could be adverse to any, perhaps all, of the items in Criterion 5, while simultaneously dictating the violation of such constraints as the limitation of operator overtime.

We believe the above justifies our request and satisfies the criteria necessary for its granting. Should you require any further information concerning our request after reviewing this submittal, please contact us.

Very truly yours,



PMK/mat

cc: Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing