



Wisconsin Electric POWER COMPANY
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February 14, 1984

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Dear Mr. Denton:

DOCKETS 50-266 AND 50-301
RULE 10 CFR 50
LICENSED OPERATOR STAFFING AT
NUCLEAR POWER PLANTS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In response to NRC comments expressed during our meeting with members of your staff on January 10, 1984, Wisconsin Electric Power Company is revising its previous submittal dated September 30, 1983 on the above subject. Although our philosophy has not changed from that stated in our September 30 letter, we do believe that adjustment of the exemption and extension requests submitted with that letter is possible presuming that we do not experience excessive attrition in the foreseeable future.

The Point Beach Nuclear Plant is a two-unit, single-control room facility and as of February 1, 1984 our operator staffing is based on a six-crew rotation with the following specific personnel complement:

	<u>Per Shift⁽¹⁾</u> <u>Quota</u>	<u>Six-Crew</u> <u>Requirement</u>	<u>Actual</u> <u>Available</u>
Shift Superintendent (SRO)	1	6	8
Operating Supervisor (SRO)	1	6	6
Operating Supervisor Trainee (SRO) (Upgrade Examination Scheduled 06/84)	-	-	2
Control Operator (RO)	2	12	12
Auxiliary Operator (RO)	1	6	4
Control Operator Trainee (Examination Scheduled 12/84)	-	-	6
Auxiliary Operator	3	18	9
Auxiliary Operator Trainee (Qualifications Expected 04/84)	-	-	7

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	<u>Per Shift (1) Quota</u>	<u>Six-Crew Requirement</u>	<u>Actual Available</u>
Auxiliary Operator Trainee (Qualifications expected 09/84)	-	-	10
Nuclear Plant Operator Trainee (Qualifications expected 09/85)	-	-	11
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Totals	8	48	75

(1) Per Shift Quota is for two-unit operation.

We believe the above table clearly demonstrates that sufficient number of operating personnel are currently in place but adequate qualifications for all personnel have not yet been fully realized to achieve the desired per shift quota of qualified operators (licensed and non-licensed). The route to operator licensing has the inherently long lead time (3-5 years) of required training and experience which should not be expedited or decreased. This fact, together with the generic nuclear industry problems related to retention and staff expansion, has prevented Wisconsin Electric from fully qualifying and licensing sufficient personnel to satisfy the three reactor operator license requirement for a two-unit facility as stated in 10 CFR 50.54(m)(2) based on a six-crew rotation without excessive overtime for licensed personnel or reassignment from other high priority activities. Current staffing leaves two of the six-crew complements short the third licensed reactor operator. Furthermore, the process of upward progression has created vacancies in the auxiliary operator ranks.

Because of the number of trainees currently in place in the training pipeline, Wisconsin Electric believes that Point Beach can have sufficient numbers of licensed personnel available to satisfy the additional reactor operator license requirement by March 1, 1985 without having to rely on excessive overtime or reassignment to comply with the requirement. We, therefore, request an extension of the required implementation date for 10 CFR 50.54(m)(2) from January 1, 1984 to March 1, 1985. During the interim period, Point Beach will satisfy the third reactor operator license requirement through overtime or reassignment of either licensed personnel or those personnel in direct training for a license. This is a change in our extension request. The compensatory action of having at least a control operator trainee in place of a third "licensed operator" provides the shift with another person to monitor an operating unit should a hypothesized accident draw the attention of two licensed operators and the senior reactor operator in the control

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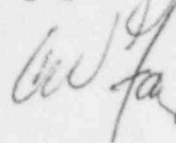
room. This third person would have at least one year of experience as a watch-standing auxiliary operator at Point Beach and, therefore, would be familiar with plant systems and procedures; he further has had several months of training in theory and any control board manipulations would be under the direct supervision of a licensed senior reactor operator.

We also hereby withdraw both exemption requests submitted with the September 30 letter. You will recall that one exemption had to do with the second senior reactor operator on shift. We had stated that there are times in the licensing process when we promote an individual, train him for a senior reactor operator upgrade, and would like to have him stand an operating supervisor watch while we are waiting for the examination and/or results. We would notify the NRC prior to doing this. Your staff indicated that it would be sympathetic to such requests when the clear need was demonstrated in a given situation, but that a blanket exemption was not appropriate. Hence, we withdraw the original request and instead plan to approach you on a case-by-case basis should the need arise.

The second exemption concerned the need for a third reactor operator when one unit was running and the second unit was in refueling or cold shutdown. As we indicated at the January 10 meeting, we believe our compact control room and plant design allows Point Beach to be safely operated with two reactor operators and two senior reactor operators under these conditions. However, we do not have a human factors-based control room design review completed at this time to support that conclusion. Your staff indicated that when we have a review done they would be willing to review it in support of an exemption request.

As can be seen from the included table, little allowance exists for the loss of licensed personnel to any cause. While our efforts to develop and license qualified personnel will continue toward the achievement of our goal of full compliance without overtime assignments based on six crews, we may be required to review the situation with you if losses occur.

Very truly yours,



Vice President-Nuclear Power

C. W. Fay

Copy to NRC Resident Inspector