

UNITED STATES

MAY 2 5 1984

Docket No.: 50-445

Mr. M. D. Spence President Texas Utilities Generating Company 400 N. Olive Street LB-81 Dallas, Texas 75201

Dear Mr. Spence:

Subject: Operating Shift Staffing for Comanche Peak

In response to a request from the Commission, the NRC staff has been tasked with performing a special review of the operating shift staffing for each nuclear plant approaching an operating license decision. The objective of the review is to assure that the operating shift crews have adequate previous "hot" operating experience. In cases where this experience is not available within the ranks of the licensed plant operators, such that shift advisors must be used, the review is to assure the adequacy of the shift advisor qualifications.

The criteria against which the crew experience will be reviewed are contained in the proposal by the Industry Working Group, presented to the Commissioners on February 24, 1984, by Mr. J. H. Miller of Georgia Power Company and Mr. D. F. Schnell of Union Electric Company. A copy of the industry proposal is enclosed (Enclosure 1). The staff has recommended that the Commission accept the industry proposal subject to the following:

- With regard to the shift crews that meet the industry experience proposal:
  - a. The Hot Participation Experience tabulated in Mr. Miller's slide 5 (Operating Shift Experience Requirements) should be at a large, same type plant.
    - b. The use of an SRO-licensed STA to satisfy the Hot Participation Experience is acceptable provided that the STA serves as a member of the shift.

8406060468 850525 PDR ADUCK 05000445 A PDR 2. With regard to the use of shift advisors:

a. The shift advisors that have at least one year on shift as a licensed SRO at an operating plant of the same type are acceptable. Proposals to utilize an individual as an advisor who has only an RO license will be evaluated on a case-by-case basis to assure that an appropriate level of knowledge and supervisory experience has been accumulated.

MAY 2 5 1984

- b. The utility-administered examinations for advisors should include both oral and written examinations. If no plantreference simulator is available, a board of at least three individuals, qualified at the SRO level, should conduct the oral examination.
- c. The utility should provide the NRC with a list of certified advisors and their qualifications. The NRC staff should be notified one month prior to their release.

We are in receipt of your March 1984 letter to Mr. Denton which summarized the experience levels of your operating crew personnel. In order to perform our review, we need confirmation that the data presented in your March 1984 letter is still correct, together with an explicit statement as to whether you do or do not plan to use shift advisors to augment the operating shifts. In addition, if you do plan to use shift advisors, we need information as shown in Enclosure 2.

In order to support the Comanche Peak licensing schedule, the above information should be provided to the staff within one week of the date of this letter.

Should you have questions regarding this matter, the staff point of contact is Mr. L. P. Crocker in the Division of Human Factors Safety, who can be reached on 301/492-4891. This collection of information has been approved by OMB under OMB control number 3150-0011 which expires April, 1985.

Sincerely,

Original signed by Darrell G. Eisenhut

Darrell G. Eisenhut, Director Division of Licensing

Enclosures:

- 1. Industry Proposal
- Information Requirements for Shift Advisors

10 DL:LB#1

BJYoungblood

5/25/84

cc: See next page

ASAM DL: AD/L TMNovak

 $5/_{1}/84$ 

Delisenhu 20784

DIST: Docket File NRC PDR Local PDR PRC System

CONCURRENCES:

DL:LB#1

O'SBurwell

5/24/84

LB#1 Rdg MRushbrook SBurwell OELD. Attorney

ACRS 16 EJordan NGrace

LCrocker

- 2. With regard to the use of shift advisors:
  - The shift advisors that have at least one year on shift as a licensed SRO at an operating plant of the same type are acceptable. Proposals to utilize an individual as an advisor who has only an RO license will be evaluated on a case-by-case basis to assure that an appropriate level of knowledge and supervisory experience has been accumulated.

MAY 2 5 1984

-2-

- b. The utility-administered examinations for advisors should include both oral and written examinations. If no plantreference simulator is available, a board of at least three individuals, qualified at the SRO level, should conduct the oral examination.
- c. The utility should provide the NRC with a list of certified advisors and their qualifications. The NRC staff should be notified one month prior to their release.

We are in receipt of your March 1984 letter to Mr. Denton which summarized the experience levels of your operating crew personnel. In order to perform our review, we need confirmation that the data presented in your March 1984 letter is still correct, together with an explicit statement as to whether you do or do not plan to use shift advisors to augment the operating shifts. In addition, if you do plan to use shift advisors, we need information as shown in Enclosure 2.

In order to support the Comanche Peak licensing schedule, the above information should be provided to the staff within one week of the date of this letter.

Should you have questions regarding this matter, the staff point of contact is Mr. L. P. Crocker in the Division of Human Factors Safety, who can be reached on 301/492-4891. This collection of information has been approved by OMB under OMB control number 3150-0011 which expires April, 1985.

Sincerely.

Darrell G. Eisenhut, Director Division of Licensing

Enclosures:

- 1. Industry Proposal
- Information Requirements for Shift Advisors
- cc: See next page

## COMANCHE PEAK

Mr. M. D. Spence President Texas Utilities Generating Company 400 N. Olive St., L.B. 81 Dallas, Texas \_75201

cc: Nicholas S. Reynolds, Esq. Bishop, Liberman, Cook, Purcell & Reynolds 1200 Seventeenth Street, N. W. Washington, D. C. 20036

> Robert A. Wooldridge, Esq. Worsham, Forsythe, Sampels & Wooldridge 2001 Bryan Tower, Suite 2500 Dallas, Texas 75201

Mr. Homer C. Schmidt Manager - Nuclear Services Texas Utilities Generating Company 2001 Bryan Tower Dallas, Texas 75201

Mr. H. R. Rock Gibbs and Hill, Inc. 393 Seventh Avenue New York, New York 10001

Mr. A. T. Parker Westinghouse Electric Corporation P. O. Box 355 Pittsburgh, Pennsylvania 15230

David J. Preister Assistant Attorney General Environmental Protection Division P. O. Box 12548, Capitol Station Austin, Texas 78711

Mrs. Juanita Ellis, President Citizens Association for Sound Energy 1426 South Polk Dallas, Texas 75224 Mr. James E. Cummins Resident Inspector/Comanche Peak Nuclear Power Station c/o U. S. Nuclear Regulatory Commission P. O. Box 38 Glen Rose, Texas 76043

Mr. John T. Collins U. S. NRC, Region IV 611 Ryan Plaza Drive Suite 1000 Arlington, Texas 76011

Mr. Lanny Alan Sinkin 114 W. 7th, Suite 220 Austin, Texas 78701

B. R. Clements Vice President Nuclear Texas Utilities Generating Company Skyway Tower 400 North Olive Street L. B. 81 Dallas, Texas 75201

William A. Burchette, Esq. 1200 New Hampshire Avenue, N. W. Suite 420 Washington, D. C. 20036

Ms. Billie Pirner Garde Citizens Clinic Director Government Accountability Project 1901 Que Street, N. W. Washington, D. C. 20009