



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MAY 31 1984

Docket No. 50-352/353

Mr. Edward G. Bauer, Jr.
Vice President & General Counsel
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Dear Mr. Bauer:

Subject: Operating Shift Staffing for Limerick Generating Station

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:

1. 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.
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.

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- b. The utility-administered examinations for advisors should include both oral and written examinations. If no plant-reference 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 December 19, 1983 and April 4, 1984 letters to the NRC staff which summarized the experience levels of your operating crew personnel. In order to perform our review, we need confirmation that the information presented in your December 19, 1983 and April 4, 1984 letters 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 Limerick licensing schedule, the above information should be provided to the staff within 60 days 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
- 2. Information Requirements for Shift Advisors

cc: See next page

CONCURRENCES:

DL:LB#2/PM	DL:LB#2/BC	AD:DL	DL:DIR
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5/24/84	5/24/84	5/24/84	5/25/84

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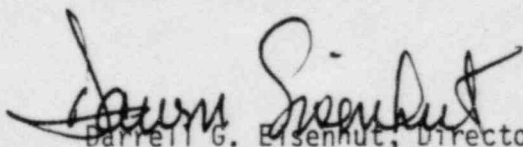
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Sincerely,


Darrell G. Eisenhut, Director
Division of Licensing

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1. Industry Proposal
2. Information Requirements for Shift Advisors

cc: See next page

Limerick

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