



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

DOCKET NO. 50-333

Section 50.54(m)(2) of 10 CFR Part 50 requires that, effective January 1, 1984, the minimum shift staffing for an operating single unit nuclear power plant include two licensed senior reactor operators (SROs) and two licensed reactor operators (ROs). Since January of 1980, licensees have also been required to provide engineering expertise to each shift. This expertise generally has been provided by a Shift Technical Advisor, who is a degreed engineer or equivalent and who has received special training in the analysis of and response to plant transients.

By letter dated January 26, 1984, the New York Power Authority, licensee for the James A. FitzPatrick Nuclear Power Plant, under the provisions of 10 CFR 50.12, requested a temporary exemption from the staffing requirements of 10 CFR 50.54(m)(2) for the FitzPatrick plant. Specifically, the licensee desires to operate the FitzPatrick plant until June 1985 with only one SRO assigned to each operating shift instead of the two SROs required by the regulation.

In justification of its request, the licensee points out that the shift staffing at the FitzPatrick plant has included two SROs and two ROs since September 1983, so that the licensee is now in compliance with the new staffing rule. However, the licensee recently arranged for, and is now conducting, a special training program for SROs which is designed to provide the SROs with engineering education or training that meets or exceeds the educational requirements specified in the Draft Commission Policy Statement on Engineering Expertise on Shift (Federal Register, Vol. 48, No. 143, July 25, 1983). The intent of the SRO education and training program is to upgrade SRO qualifications such that the engineering expertise on shift can be consolidated with the SRO positions, thereby eliminating the need for a separate Shift Technical Advisor (STA). The program which has been arranged is INPO approved and is being conducted on site by an accredited college.

Effective conduct of the training program, however, requires that the licensee remove one of the two SROs from each shift so that the relieved individuals can devote full time to the training.

The licensee considers that the following factors will compensate for the lack of the second SRO during the period of the exemption:

1. All operator training programs have been upgraded in accordance with the requirements of NUREG-0737 and have been found acceptable by the NRC.
2. During day shifts, additional senior operators will be readily available on site since all training classes will be held on site.
3. During back shifts, an additional SRO will always be available on call.

The intent of the licensee is to conduct two seven-month programs over a 15-month period such that, by June 1985, all of the licensee's nondegreed SROs will have taken the course. The first course started during the week of February 20, 1983.

The licensee considers that the SRO training program is in accordance with the NRC goals of upgrading the capabilities of licensed operators. In the absence of the requested exemption, the licensee plans to reduce the number of shifts and place the SROs on a revised shift schedule so as to make SROs available to take the training.

The staff met with representatives of the licensee in Bethesda on March 22, 1984, to discuss the requested exemption. The matters discussed during the meeting focused on the training to be provided to the SROs and the measures the licensee could take to compensate for the absence of one of the SROs from each shift. No resolutions were reached during the meeting. It was agreed

that the licensee would consider further the question of compensatory measures and would submit additional information if appropriate. As of the date of this evaluation, no additional information has been received.

Conversations with representatives of the licensee indicated that at least part of the impetus for upgrading the SRO qualifications stems from problems the licensee has encountered in retaining qualified STAs at the plant. The FitzPatrick STAs are all degreed engineers and they rotate with the shifts. However, there now are only four STAs at the plant. Degreed SROs from the plant staff are being used to supplement the remaining STAs.

At this time, the Commission Policy Statement on Engineering Expertise on Shift still is in draft form. While it may be approved ultimately, there is as yet no indication that the Commission will accept, for individuals proposed for dual-role STA/SRO positions, educational credentials that are significantly less than the baccalaureate degree referred to in the draft Policy Statement. While we do not know the details regarding the licensee's proposed training program for the FitzPatrick SROs, it seems unlikely that a seven-month program could result in educational qualifications that would meet the Commission's criteria as stated in the draft Policy Statement such that these individuals could serve in a dual capacity as STA/SRO.

Approval of this request would result in a decreased on-shift capability for a period of 15 months, and could result in individuals still not being qualified to meet the criteria as finally set by the Commission for dual-role STA/SROs. It should, however, result in having SROs who are better qualified to operate the plant safely under all conditions. However, on balance, we do not feel that added operator capability 15 months in the future will compensate for the lack of half of the required number of SROs on shift during the intervening period, even with the compensating measures proposed by the licensee.

Accordingly, since we cannot conclude that plant safety would not be adversely affected by the removal of one SRO from each shift, and since there is no assurance that the training programs proposed by the licensee would in fact produce individuals who might meet the criteria for dual-role use as both STAs and SROs, we conclude that the licensee's request for exemption should be denied.

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Dated: June 20, 1984