



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

Docket Nos.: 50-445/446

MAR 01 1985

M.D. Spence, President  
Texas Utilities Electric Company  
400 N. Olive St., LB 81  
Dallas, TX 75201

Subject: Use of Shift Advisors at Comanche Peak

Dear Mr. Spence:

Generic Letter 84-16 (Adequacy of On-Shift Operating Experience for Near Term Operating License Applicants), provides NRC guidance regarding on-shift operating experience. Additionally, Generic Letter 84-16 states that after March 31, 1985, personnel should be on-shift with sufficient operating experience such that there is no longer the need to rely on the use of shift advisors. On January 30, 1985, TUGCO requested approval for the use of qualified and trained shift advisors to supplement on-shift operating experience beyond the March 31, 1985 date specified by Generic Letter 84-16.

Texas Utilities Electric Company had anticipated licensing of Comanche Peak, Unit 1 prior to March 31, 1985, and consequently expected to be unaffected by Generic Letter 84-16. However, the Licensing Board has advised that it may not be ready to issue its initial decision until May 1985 and consideration of issuance of an operating license would be after that date. Therefore, the Generic Letter would require Comanche Peak, Unit 1 to forego the use of shift advisors. The Generic Letter acknowledges that circumstances might arise that would require use of shift advisors beyond the March 31, 1985 date.

The staff believes the elimination of the Comanche Peak, Unit 1 shift advisors would be highly disruptive to the plant operations at this late date. The staff has examined the qualifications of the shift advisors and concluded that they are acceptable to meet the operating experience criterion. Results of the staff's evaluation are reported in SSER No. 6 for Comanche Peak (NUREG-0797, Supplement 6, November 1984). It is the staff's understanding that five of the six shift advisors have been on site since late 1982 and are now fully integrated on the operating shifts. Consequently, the staff finds it acceptable to use shift advisors subsequent to March 31, 1985.

Nevertheless, a substantial delay between completion of the pre-fuel load testing and the ASLB initial decision might be used to your advantage to

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obtain selected operating experience for your licensed operators. The staff encourages you to seek opportunities for experience that would be applicable to Comanche Peak start-up by having some of your operators participate in similar activities at plants of the same type that are now in the start-up phase.

Sincerely,

Vincent S. Noonan, Director  
Comanche Peak Project

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*\* See previous Concurrence*

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