

New Hampshire Yankee

NYN-92075

June 4, 1992

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

References: (a) Facility Operating License No. NPF-86, Docket No. 50-443
(b) USNRC Letter dated May 5, 1992, "NRC Region 1 Inspection 50-443/92-05 (3-3-92/4-6-92)," J. C. Linville to T. C. Feigenbaum

Subject: Reply to a Notice of Violation

Gentlemen:

In accordance with the requirements of the Notice of Violation contained in Reference (b), the New Hampshire Yankee response to the cited violation is provided as Enclosure 1.

Should you have any questions concerning this response, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 474-9521, extension 3772.

Very truly yours,



R. Jeb DeLoach
Executive Director -
Engineering and Licensing

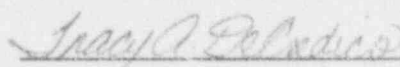
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Enclosure

STATE OF NEW HAMPSHIRE

Rockingham, ss.

June 4, 1992

Then personally appeared before me, the above-named R. Jeb DeLoach, being duly sworn, did state that he is Executive Director of Engineering and Licensing of the New Hampshire Yankee Division of Public Service Company of New Hampshire, that he is duly authorized to execute and file the foregoing information in the name and on the behalf of New Hampshire Yankee Division of the Public Service Company and that the statements therein are true to the best of his knowledge and belief.



Tracy A. DeCredico, Notary Public

TRACY A. DECREDICO, Notary Public
My Commission Expires October 3, 1995

New Hampshire Yankee Division of Public Service Company of New Hampshire
P.O. Box 300 • Seabrook, NH 03874 • Telephone (603) 474-9521

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United States Nuclear Regulatory Commission
Attention: Document Control Desk

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cc: Mr. Thomas T Martin
Regional Administrator
U. S. Nuclear Regulatory Commission
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Mr. Gordon E. Edison, Sr. Project Manager
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New Hampshire Yankee
June 4, 1992

ENCLOSURE 1 TO NYN-92075

REPLY TO A NOTICE OF VIOLATION

Violation

During an NRC Inspection conducted March 3 - April 6, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification 6.2.2.(e) requires administrative procedures be developed and implemented to limit the working hours of station staff who perform safety-related functions, such as licensed operators. New Hampshire Yankee Station Management Manual, Chapter 2, Section 6.2, "Extended Work Hour Requirements For Safety-Related Functions," requires Station Manager's authorization documented on SSMM Form 4-4A, "Extended Work Hours Authorization," for any individual to work more than 24 hours within 48 hour period.

Contrary to the above, since September 1991, both licensed and non-licensed operators did not receive Station Manager's documentation authorization prior to working more than 24 hours within a 48 hour period as a result of modified shift rotations on weekends.

This is a Severity Level IV violation (Supplement 1).

REPLY

Reason for the Violation

New Hampshire Yankee (NHY) has determined that the reason for this violation was an inadequate implementation of the Seabrook Station Management Manual (SSMM), Chapter 2, Section 6.2 policy for "Working Hours." During the inception of the Operations Department shift schedule in May 1988, the Operations Department developed twelve (12) hour shifts for Saturdays and Sundays. This schedule eliminates an eight (8) hour shift during the weekends, allowing the personnel to work two (2) weekends out of six (6), instead of three (3) weekends out of six (6).

The normal shift schedule for the Operations Department specifies three (3), eight hour shifts during the week and two (2), twelve hour shifts on the weekends. The weekday shifts consist of: the day shift which is scheduled from 7:00am to 3:00pm, the swing shift which is scheduled from 3:00pm to 11:00pm, and the midnight shift which is scheduled from 11:00pm to 7:00am. On the weekends, the "day shift" would get the weekend off and the swing and midnight shifts' hours would be extended. The schedule would specify the swing shift crew to work from 11:00am to 11:00pm and the midnight shift crew to work from 11:00pm to 11:00am.

Contrary to the above, several operations crews changed the work hours in order to accommodate the special challenges of working the midnight shift. Working the midnight shift places additional demands on the shift crew to maintain their alertness when that shift is extended well into the day. Therefore the midnight shift preferred working 7:00pm to

7:00am on the weekends. This necessitated the swing shift to work from 7:00am to 7:00pm on the weekends.

In opting for the 7:00am to 7:00pm hours for the swing shift, the operations crews looked at the shift schedule as requiring 12 hours for the shift and failed to relate that period to the previous Friday's 8 hour shift. The swing shift crew that started their 12 hour shift at 7:00am Saturday morning had just completed their 8 hour shift Friday evening at 11:00pm. The combination of the 8 hour shift Friday and the 12 hour shift Saturday and Sunday caused the crew to work greater than 24 hours (i.e. 28 hours) within a 48 hour time period (i.e., Friday 3:00pm to Sunday 3:00pm). Had the crew properly applied the "Extended Work Hours Authorization Policy" as defined in SSMM Chapter 2, Section 6.2, a request for Station Manager Authorization would have been utilized.

Corrective Action to Prevent Recurrence

To preclude a recurrence of an event of this type, the Operations Manager issued a night order in the Operations Night Order Book which in part, directed the crews to adhere to the established 11:00am to 11:00pm weekend schedule. Deviation from the 11:00am to 11:00pm schedule must be approved by the Shift Superintendent and either the Operations Manager or the Assistant Operations Manager. Should an approved shift deviation create an extended work hour condition, documented Station Manager authorization must be obtained prior to the shift. In addition to the immediate action, the following long term actions will be implemented:

- 1) The shift schedule form will be revised to delineate the exact working hours for a weekend or 12 hour shift.
- 2) An enhanced tracking program will be developed using a sliding scale (hourly) to assist in the determination of any work hour limitations conflicts.
- 3) A procedure will be developed to control personnel hour swapping. This procedure will provide strict controls and an appropriate level of review and approval.

Date of Full Compliance

New Hampshire Yankee is currently in full compliance with Technical Specification 6.2.2.(e). It is anticipated that the long term corrective actions described above will be completed by June 30, 1992.