

ADMINISTRATIVE CONTROLS

- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 12 hour day with alternating 48 hour and 36 hour work week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:

- 1) An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;
- 2) An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 28 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time;
- 3) A break of at least 8 hours should be allowed between work periods, including shift turnover time; and
- 4) Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Station Manager or his deputy, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Station Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

8412280084 841210
PDR ADOCK 05000369
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JUSTIFICATION AND SAFETY ANALYSIS

The proposed changes to the Technical Specifications concerning overtime and normal work day are necessitated by the institution of a twelve hour shift (work day) at the McGuire Nuclear Station.

The main reason to institute a twelve hour shift at McGuire Nuclear Station is that this system has been found to be more efficient for the individual workers as well as Duke Power Company. An eight hour shift involves three turnovers per day. For smooth and efficient operation it is crucial that the turnover is properly managed. A twelve hour shift reduces the turnovers to two per day with the added advantage that the individual worker transfers the duties to the person from whom they had taken over the duties twelve hours earlier. This continuity has provided an additional element of familiarity with the ongoing operations for the shift workers and has resulted in enhanced safety and improved work quality. The change to allow an individual to work 28 hours in a 48 hour period (section F.2) is intended to provide necessary flexibility. Instances may arise when an individual works 16 hours, takes a 12-hour break, and returns for his normal 12-hour shift. This change will allow him to complete that normal shift.

The normal work week at McGuire Nuclear Station now consists of a nominal twelve hour day with alternate 48 hour and 36 hour work weeks. The nominal hours per worker are 2128 hours per year. These changes have also resulted in reduced need for overtime.

Management and worker alike now overwhelmingly favor the twelve hour work day for being more efficient and conducive to safer operations. The proposed changes of the Technical Specifications would not have any adverse safety implications.

ANALYSIS OF SIGNIFICANT HAZARDS CONSIDERATIONS

Pursuant to the requirements of 10CFR50.91, the following analysis provides assurance that the proposed changes in the Technical Specifications would not involve any significant hazards consideration as defined by 10CFR50.92.

The proposed changes in the Technical Specifications are to reflect the current shift work and overtime policies at McGuire Nuclear Station. The change to the twelve hour work day with alternate 48 hour and 36 hour work weeks has enhanced the efficiency and safety of operations. The proposed changes are purely administrative in nature and would not contribute to any accident mechanisms or their consequences.

The proposed amendments would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- 3) Involve a significant reduction in a margin of safety.

Based upon the preceding analysis, Duke Power Company concludes that the proposed amendments do not involve a significant hazard consideration.