

TEXAS UTILITIES GENERATING COMPANY

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BILLY R. CLEMENTS
VICE PRESIDENT, NUCLEAR OPERATIONS

January 30, 1985
TXX #4406

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Use of Shift Advisors at the Comanche Peak Steam
Electric Station (CPSES)

Dear Mr. Denton:

On June 14, 1984, the Chairman of the U. S. Nuclear Regulatory Commission sent a letter to Mr. J. H. Miller, President of Georgia Power Company, in which the Commissioners accepted, with some clarifications, a Nuclear Utilities Management and Human Resources Committee (NUMARC) proposal on the subject of on-shift operating experience for near term operating license applicants.

On June 27, 1984, Mr. D. G. Eisenhut issued Generic Letter 84-16, endorsing the NUMARC proposal as clarified by the Commissioners. This Generic Letter stated that March 31, 1985, would be the latest date for the use of shift advisors. It stated, however, that circumstances may arise, beyond the control of the utility, which would mandate the use of advisors to cover one or more shifts beyond March 31, 1985, on a case-by-case basis.

Anticipating licensing of Comanche Peak Steam Electric Station prior to March 31, 1985, Texas Utilities Electric Company retained experienced shift advisors to augment the on-shift experience of station operating personnel. These advisors exceed the qualification requirement proposed by NUMARC, have been trained and certified to the USNRC, and have been integrated into the shift crews at the station.

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As a result of additional time being required to complete the Operating License process, it is likely that the license for Comanche Peak Steam Electric Station Unit 1 will not be issued until after March 31, 1985. This unexpected circumstance was clearly not anticipated in June, 1984, when the decisions concerning the use of shift advisors had to be made.

Therefore, your approval of the use of qualified and trained shift advisors to supplement on-shift operating experience at Comanche Peak Steam Electric Station is requested in the apparent event that Operating License issuance for Comanche Peak Steam Electric Station Unit 1 is delayed beyond March 31, 1985.

We will be glad to provide further information concerning this issue or to meet with you at your convenience.

Sincerely,

Billy R. Clement

BRC:msc

c: Mr. R. D. Martin
Regional Administrator
USNRC, Region IV
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