



Wisconsin Electric POWER COMPANY
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February 14, 1985

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Attention: Mr. J. R. Miller, Chief
Operating Reactors, Branch 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
LICENSED OPERATOR STAFFING UPDATE
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Your letter dated March 26, 1984 requested updates of our status for implementation of 10 CFR 50.54(m)(2)(i), licensed operator staffing requirements. An update was provided to you on August 2, 1984. We did not anticipate a significant change in the number of licensed operators until after the licensing examinations in December 1984. In view of that, you were informed that the next status report would not be sent until we were informed of the results of those examinations.

All candidates presented for examination in December 1984 passed. This resulted in four reactor operator (RO) licenses and two senior reactor operator (SRO) certifications. The RO's were added to the on-shift complement and the two SRO-certified people were assigned to the Training group.

Attachment 1 illustrates the on-shift staffing complement and how it has changed over the past years. As can be seen, the total number of SRO's and those in training for a SRO license has not changed. The total number of RO's and those in training for a RO license has decreased by two. The total number of non-licensed auxiliary operators (AO's) and trainees has decreased by three. This results in a net decrease of five on-shift operators.

Attachment 1 also illustrates that we will have sufficient licenses on March 1, 1985 to satisfy the requirements of 10 CFR 50.54(m)(2)(i). However, as we indicated might be the case in our August 2 letter, there are not sufficient licenses at this time to adequately compensate for any unexpected attrition that might occur. It should also be noted that there are presently no operators in training for replacement licenses or license

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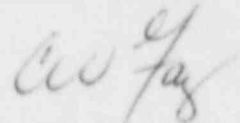
upgrades. This is primarily due to resources in the Training group being directed toward preparing operator training programs for INPO accreditation. We do not anticipate, because of this redirection of training resources, to start the next class of license candidates until the fall of 1985, with examination by the NRC in late 1986.

The licensing of new operators is important in maintaining proper staffing levels. Of more importance in maintaining qualified personnel to safely operate a nuclear plant is the retention of capable experienced licensed operators. A major effect on the retention of licensed operators, and the incentive for non-licensed operators to become licensed, is the approach the NRC takes in the operator license renewal and requalification process. Of primary concern is the apparent emphasis the NRC has placed on written examinations based on debatable knowledge requirements that are used to determine if the operator is still "qualified" to hold a license. We encourage the NRC to be receptive to alternatives to this examination process. There are other performance-based mechanisms that are more reliable in determining if an operator should continue to be licensed.

Our basic philosophy expressed in our September 30, 1983 letter concerning on-shift licensed operator requirements has not changed. It is appropriate to reiterate two items presented in our February 14, 1984 letter. First, based on the results of our control room design review, we may again request that the staffing requirements for a unit in cold shutdown be reevaluated and reduced. Second, we will continue to make a good faith effort to maintain present staffing levels, but we may be required to review this situation with you if losses occur.

Proposed changes to the Point Beach Technical Specifications which reflected shift staffing requirements in accordance with 10 CFR 50.54(m) were included as part of our license amendment application and change request No. 88 dated March 16, 1984. Please contact us if you have any questions regarding these changes or the information presented in this letter.

Very truly yours,



Vice President-Nuclear Power

C. W. Fay

Attachment

Copy to NRC Resident Inspector

Attachment

POINT BEACH NUCLEAR PLANT
ON-SHIFT STAFFING COMPLEMENT

	<u>Six-Crew Requirement (Per Shift)</u>	<u>Available 02/01/84</u>	<u>Available 02/01/84</u>	<u>Change</u>
Shift Superintendent (SRO)	6(1)	8	9	+ 1
Operating Supervisor (SRO)	6(1)	6	7	+ 1
Operating Supervisor Trainee	----	2	0	- 2
Control Operator (RO)	12(2)	12	12	0
Auxiliary Operator (RO)	6(1)	4	8	+ 4
Control Operator Trainee	----	6	0	- 6
Auxiliary Operator	12(2)	9	17	+ 8
Auxiliary Operator Trainee	6(1)	28	17	-11
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Totals	48	75	70	- 5

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