PDR

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

DEC 24 1984

Robert J. Kaler, Esquire
Gadsby & Hannah
One Post Office Square
Boston, MA 02109

IN RESPONSE REFER
TO FOIA-84-143

Dear Mr. Kaler:

This is in further response to your Freedom of Information Act (FOIA) request dated February 23, 1984, and your subsequent letter of July 30, 1984. In your July 30, 1984, letter you identified, from printouts which we provided earlier, selected documents which you requested be subject to your request.

Subsequently, we made available some of these documents, identified in letters to you dated September 24, 1984, and October 9, 1984. The remaining records, identified on the enclosed Appendix C, are now available for public inspection and copying at the NRC Public Document Room.

This completes NRC's action on your request.

Sincerely,

J. M. Felton, Director
Division of Rules and Records
Office of Administration

Enclosure: As stated

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APPENDIX C

RECORDS MAINTAINED IN PDR FILE FOIA-84-143

1. 02/09/81 Memorandum for G. L. Madsen, Region IV, from G. L. Constable, Region IV, entitled "LP&L Meeting with NRR Concerning Operational Staffing of Waterford-3 Nuclear Station (DN 50-382) (Scheduled for 2/18/81)" with two attachments (total of 6 pages).

2. 02/12/81 Memorandum for James H. Sniezek, IE:DRRRI, from G. L. Madsen, Region IV, entitled "Louisiana Power & Light Company (LP&L) Meeting with NRR Concerning LP&L's Plans for Operational Staffing of the Waterford-3 Nuclear Station (DN 50-382)" (1 page).

3. 11/24/82 Memorandum for ASLB and ASLAB from Thomas M. Novak, DL, entitled "Board Notification - Alleged Design Deficiency (Board Notification No. 82-105)" (2 pages).

4. 05/13/83 Memorandum for Raymond F. Fraley, ACRS, from William J. Dircks, EDO, entitled "ACRS Concerns Regarding Waterford-3 Training" (1 page).

5. 06/20/83 Memorandum for Thomas M. Novak, NRR:DL, from James P. Knight, NRR:DE, entitled "Input for Waterford-3 SER Supplement" (2 pages).

6. Undated Document entitled "Observations - Waterford Unit 3 Site" (5 pages).

UNITED STATES

NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE SUITE 1000
ARLINGTON, TEXAS 76011

February 9, 1981

MEMORANDUM FOR: G. L. Madsen, Chief, Reactor Operations & Nuclear Support Branch

THRU: T. F. Westerman, Chief, Reactor Projects Section No. 1

FROM: G. L. Constable, Senior Resident Inspector

SUBJECT: LP&L MEETING WITH NRR CONCERNING OPERATIONAL STAFFING OF WATERFORD-3 NUCLEAR STATION (DN 50-382) (Scheduled for 2/18/81)

Mr. D. L. Aswell, Vice President, Power Production of LP&L, has requested a meeting with NRR to discuss LP&L's plans for operational staffing of the Waterford-3 Nuclear Station. The purpose of this meeting is to present their plans and to solicit NRC views on how they are doing. It is my opinion that they are not doing well and that there is internal disagreement on staffing philosophy within LP&L which is having a negative impact on their effort to put together an operating organization. I am concerned that LP&L may not have the proper combination of manpower, training and experience to safely operate the Waterford-3 Nuclear Station within the time frame that the license is expected to be issued (October 1982). This concern is due to (1) turnover problems, (2) lack of nuclear utility experience of the permanent plant staff, (3) lack of involvement of the permanent staff in preoperational testing and startup due to training requirements, and (4) expected loss of the experienced operators and startup engineers that will occur as startup is completed.

The purpose of this memo is to present my observations and comments which have been made to me over the past 18 months to be used as background information for those NRC representatives who will be attending this meeting. Attachment 1 is a synopsis of observations documented in inspection reports since 9/1/

A report on staff turnover was presented during an ANS meeting in 1977. This report, based on a response from 19 sites, stated there was a turnover rate between 10% and 20% per year for professional technical people at nuclear plants. For LP&L operators this turnover rate has been about 35%. I do not have the figures for the other subgroups on LP&L's permanent staff. You

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may hear the argument that the turnover rate has slowed during the last few months; however, it is not clear whether this is due to a recent pay raise or a temporary condition caused by current mortgage rates.

The reasons for the turnover of operators are concerns about their future if they stay with LP&L, local working conditions, and salary. While these issues are not of direct concern to NRC, they are the central cause of LP&L's problems. I have included Attachment B, which presents many comments that have been made to me as well as my personal observations, to allow NRC a better understanding of the issues that face LP&L management. Based on these comments and observations, it is my impression that LP&L's senior management believe that plant operators are nonprofessional technical employees and their careers should begin and end on shift in the control room of a power plant.

The lack of nuclear utility experience appears to be almost entirely a pay problem. LP&L is simply not willing to pay the going rate which would help put experienced people on their permanent staff. They are, however, willing to pay competitive salary for temporary help. They have about 50 temporary technical people, primarily in the startup group, who have a broad range of experience. As consultants they are much better paid than the permanent staff, including such fringe benefits as per diem and mileage to and from work. These temporary people are presently writing all of the procedures that are to be used for preoperational testing, startup and operations. My concern is the people who are writing these procedures, accepting systems as part of the plant turnover, and who will be heavily involved in testing these systems will leave with their experience when startup is complete. The permanent plant staff is in the review chain for these procedures and it is intended that the operators will actually operate the systems but it is not clear that their involvement is more than superficial.

The training of the permanent plant staff could resolve many of my concerns. Essentially, all of the operators in training and most of the Waterford-3 supervisors have come to LP&L from the nuclear Navy. If enough time were available to train them in the operation of a commercial reactor and heavily involve them in preoperational testing of this facility, the lack of experience could be overcome.

Waterford-3's training department presently consists of one full time individual. His experience is from the Army reactor program and consulting. He is a non-degreed person and has not qualified as RO or SRO on a commercial reactor. He has five open positions on his staff. Two of these positions have a requirement of being SRO qualified. At this late date, it will be difficult to hire people with experience or to get them trained to a level where they can effectively train the operators and the staff. The operators tell me that

training given by the vendor (CE) and the training organizations is generally not given by people experienced with this vintage of CE plants. Nor is this plant specifically taught. The courses are generic in nature. This leaves the plant staff with no one to turn to for specific information concerning Waterford-3. It would be very easy for misinformation to take on the appearance of fact because of the lack of experience with large power reactors. Some of this experience problem may be resolved when LP&L hires an operations supervisor. They have been looking for a senior SRO qualified individual for the past six months.

I expect that LP&L will give a complete status of their current staffing and training plans. I would not expect them to be open about staff turnover or the details of their planned training unless asked directly.

In summation, it is my recommendations that LP&L management be told that:

- They must solve their turnover problem or they will not likely be able to handle the job ahead of them.
- They are strongly encouraged to acquire permanent people with nuclear utility experience.
- They should heavily involve their permanent staff in preoperational and startup testing.
- They should strengthen their training program to assure adequate facility specific training.

Please call me if you have any questions. I can be reached at [illegible]

[illegible]
[illegible] Constable
Senior Resident Inspector

Attachments:
As stated

ATTACHMENT A

SYNOPSIS OF COMMENTS IN INSPECTION REPORTS

Inspection Report No.	Date
79-15	October 25, 1979

The inspector observed that the licensee had 18 people in training who were destined to be shift operators. This would have provided three licensed operators per shift for the planned six shifts. No allowance was being made to account for those who would fail the operators exam or change jobs.

The report noted that failure to have the appropriate number of licensed operators could delay issuance of the facility license.

80-11 May 9, 1980

The Inspector was informed that LP&L had hired 16 additional people to train to be licensed operators. It was noted that no one destined to be an operator at Waterford-3 had experience on large commercial nuclear power plants. All trainees were from the Navy Nuclear Power Program.

80-23 September 11, 1980

The Inspector reviewed the staffing of the LP&L Startup Group which has the responsibility for system turnover, preoperational and startup testing. It was noted that 96 of the 127 authorized positions were filled. Only 14 of these positions were LP&L employees.

80-25 November 19, 1980

The Inspector observed that the operators group now had 33 persons. Of these, 21 were scheduled to become licensed operators. Since January 1, 1980, LP&L had hired 11 new people to train as operators and 12 had left.

NOTE: The 11 hired, as referenced above, appears to conflict with the 16 referenced in 80-11. I believe the difference is in the number of people who had first indicated interest and then backed out.

ATTACHMENT E

OBSERVATIONS REGARDING STAFF TURNOVER

CAREER OPPORTUNITIES

Several operators have expressed the concern that NRC will eventually require a degree for a person to be promoted to shift supervisor.

New Orleans has several highly regarded engineering schools that have day and evening programs.

Several people at Waterford-3 have requested permission to shift their work schedule to allow them to attend night school at one of the universities in the New Orleans area. All such requests have been denied.

LP&L has said that they are working to set up an arrangement with some of the local universities to provide college level classes near the Waterford-3 site.

A high level LP&L manager has stated openly that he does not want his operators to obtain engineering degrees because they would not want to stay on shift if they did.

Since 1978, 28 operator trainees have left LP&L.

WORKING CONDITIONS

The site is in a remote location in an industrial chemical complex. Chemical smells are common. Some of the plants occasionally release Ammonia or Chlorine due to system upsets. Many on-site people are fearful of these releases.

There is very little suitable housing near the plant due to the marshes and competition from workers at the nearby chemical plants. About two-thirds of the people live in the Greater New Orleans area which involves an hour or more to commute each way. Heavy traffic, dangerous roads, limited number of bridges crossing the Mississippi River, occasional flooding and heavy fog makes commuting something of an unwanted ordeal for people unfamiliar with this area.

Normal working hours for operators not on shift is 8:00 a.m. to 5:00 p.m., with an hour for lunch. These hours are maintained to be consistent with office hours at the LP&L general office in New Orleans. This schedule is popular with most site employees due to commuting time.

WORKING CONDITIONS (Cont'd)

Some of the local chemical plants use a 12 hour shift for three or four days duration to help minimize driving and to improve morale. This has been suggested by the operators at Waterford-3 but a decision has not been made.

PAY ISSUES

LP&L is hiring ex-Navy nuclear operators to put in their cold licensing training program. These people have come right out of the Navy and usually do not initially have a clear indication of their net worth to the nuclear industry. They quickly become aware of the pay practices of other utilities. The following are some of the comments made to me about the pay practices of LP&L.

Operators in training at Waterford-3 make about $10.00 per hour. This was recently raised from $8.00 per hour.

When the operators in training successfully complete about 85% of their cold license training, they get $100.00 extra per month. After the OL is issued, SRO's will get $250.00 per month. At least one other licensee gives trainees bonuses of $500.00 to $1,000.00 for completing various phases of training.

Supervisors, including shift supervisors, will not be eligible for overtime pay. It is well known that significant overtime will be expected (1,000 hours per year is not unusual).

Operators will not receive pay for shift differential.