

hndocs **RESPONSE TO FREEDOM OF INFORMATION ACT (FOIA) REQUEST**

FOIA — 91-521

RESPONSE TYPE

☒ FINAL☐ PARTIAL

DATE

JAN 30 1992

DOCKET NUMBER(S) (if applicable)

REQUESTER

Ms. Ophelia Williams

PART I.—AGENCY RECORDS RELEASED OR NOT LOCATED (See checked boxes)

<input type="checkbox"/>	No agency records subject to the request have been located.
<input type="checkbox"/>	No additional agency records subject to the request have been located.
<input type="checkbox"/>	Requested records are available through another public distribution program. See Comments section.
<input type="checkbox"/>	Agency records subject to the request that are identified in Appendix(es) _____ are already available for public inspection and copying at the NRC Public Document Room, 2120 L Street, N.W., Washington, DC.
<input checked="" type="checkbox"/>	Agency records subject to the request that are identified in Appendix(es) <u>D</u> are being made available for public inspection and copying at the NRC Public Document Room, 2120 L Street, N.W., Washington, DC, in a folder under this FOIA number.
<input type="checkbox"/>	The nonproprietary version of the proposal(s) that you agreed to accept in a telephone conversation with a member of my staff is now being made available for public inspection and copying at the NRC Public Document Room, 2120 L Street, N.W., Washington, DC, in a folder under this FOIA number.
<input type="checkbox"/>	Agency records subject to the request that are identified in Appendix(es) _____ may be inspected and copied at the NRC Local Public Document Room identified in the Comments section.
<input type="checkbox"/>	Enclosed is information on how you may obtain access to and the charges for copying records located at the NRC Public Document Room, 2120 L Street, N.W., Washington, DC.
<input checked="" type="checkbox"/>	Agency records subject to the request are enclosed. *
<input type="checkbox"/>	Records subject to the request have been referred to another Federal agency(ies) for review and direct response to you.
<input checked="" type="checkbox"/>	Fees
<input checked="" type="checkbox"/>	You will be billed by the NRC for fees totaling \$ <u>491.98</u>
<input type="checkbox"/>	You will receive a refund from the NRC in the amount of \$ _____
<input type="checkbox"/>	In view of NRC's response to this request, no further action is being taken on appeal letter dated _____ No. _____

PART II. A—INFORMATION WITHHELD FROM PUBLIC DISCLOSURE

<input checked="" type="checkbox"/>	Certain information in the requested records is being withheld from public disclosure pursuant to the exemptions described in and for the reasons stated in Part II, B, C, and D. Any released portions of the documents for which only part of the record is being withheld are being made available for public inspection and copying in the NRC Public Document Room, 2120 L Street, N.W., Washington, DC in a folder under this FOIA number.
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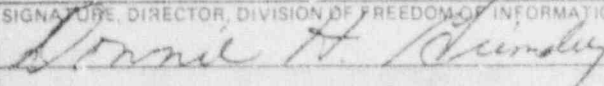
COMMENTS *Copies of the records identified on enclosed Appendix D and the releasable portions of the records identified on Appendix E are enclosed. The fees for processing your FOIA request are as follows:

Clerical Search	- 15 Mins. @ \$0.22 per min.	= \$ 3.30
Professional Search	- 11 hrs. @ \$27.93 per hr.	= 307.23
SES Search	- 1 hr. 15 mins. @ \$52.96 per hr.	= 66.16
Professional Rev	- 1 hr. 10 mins. @ \$27.93 per hr.	= 32.53
SES Review	- 1 hr. @ \$52.96 per hr.	= 52.96
Duplication	- 149 pgs. @ \$0.20 per pg.	= 29.80

Total \$491.98

You will be billed by the NRC's Division of Accounting and Finance for this amount. This completes NRC's action on your FOIA request.

SIGNATURE, DIRECTOR, DIVISION OF FREEDOM OF INFORMATION AND PUBLICATIONS SERVICES



9209090394 920130
PDR FOIA
WILLIAM91-521 PDR

**RESPONSE TO FREEDOM OF
INFORMATION ACT (FOIA) REQUEST
(CONTINUATION)**

FOIA NUMBER(S)

FOIA — 91-521

DATE

JAN 30 1992

PART II. B — APPLICABLE EXEMPTIONS

Records subject to the request that are described in the enclosed Appendix(es) E/1 are being withheld in their entirety or in part under the Exemption No. (s) and for the reason(s) given below pursuant to 5 U.S.C. 552(b) and 10 CFR 9.17(a) of NRC regulations

1. The withheld information is properly classified pursuant to Executive Order. (Exemption 1)

2. The withheld information relates solely to the internal personnel rules and procedures of NRC. (Exemption 2)

3. The withheld information is specifically exempted from public disclosure by statute indicated. (Exemption 3)

Sections 141-145 of the Atomic Energy Act, which prohibits the disclosure of Restricted Data or Formerly Restricted Data (42 U.S.C. 2161-2165).

Section 147 of the Atomic Energy Act, which prohibits the disclosure of Unclassified Safeguards Information (42 U.S.C. 2137).

4. The withheld information is a trade secret or commercial or financial information that is being withheld for the reason(s) indicated. (Exemption 4)

The information is considered to be confidential business (proprietary) information.

The information is considered to be proprietary information pursuant to 10 CFR 2.790(d)(1).

The information was submitted and received in confidence pursuant to 10 CFR 2.790(d)(2).

5. The withheld information consists of interagency or intraagency records that are not available through discovery during litigation. (Exemption 5). Applicable Privilege:

Deliberative Process: Disclosure of predecisional information would tend to inhibit the open and frank exchange of ideas essential to the deliberative process. Where records are withheld in their entirety, the facts are inextricably intertwined with the predecisional information. There also are no reasonably segregable factual portions because the release of the facts would permit an indirect inquiry into the predecisional process of the agency.

Attorney work product privilege. (Documents prepared by an attorney in contemplation of litigation.)

Attorney-client privilege. (Confidential communications between an attorney and his/her client.)

☒ 6. The withheld information is exempted from public disclosure because its disclosure would result in a clearly unwarranted invasion of personal privacy. (Exemption 6)

7. The withheld information consists of records compiled for law enforcement purposes and is being withheld for the reason(s) indicated. (Exemption 7)

Disclosure could reasonably be expected to interfere with an enforcement proceeding because it could reveal the scope, direction, and focus of enforcement efforts, and thus could possibly allow recipients to take action to shield potential wrongdoing or a violation of NRC requirements from investigators. (Exemption 7 (A))

Disclosure would constitute an unwarranted invasion of personal privacy. (Exemption 7 (C))

The information consists of names of individuals and other information the disclosure of which could reasonably be expected to reveal identities of confidential sources. (Exemption 7 (D))

OTHER

PART II. C — DENYING OFFICIALS

Pursuant to 10 CFR 9.25(b) and/or 9.25(c) of the U.S. Nuclear Regulatory Commission regulations, it has been determined that the information withheld is exempt from production or disclosure, and that its production or disclosure is contrary to the public interest. The persons responsible for the denial are those officials identified below as denying official(s) and the Director, Division of Freedom of Information and Publications Services, Office of Administration, for any denials that may be appealed to the Executive Director for Operations (EDO).

DENYING OFFICIAL	TITLE OFFICE	RECORDS DENIED	APPELLATE OFFICIAL		
			EDO	SECRETARY	IG
John B. Martin	Regional Administrator, RV	E/1	<input checked="" type="checkbox"/>		

PART II. D — APPEAL RIGHTS

The denial by each denying official identified in Part II. C may be appealed to the Appellate Official identified there. Any such appeal must be made in writing within 30 days of receipt of this response. Appeals must be addressed, as appropriate, to the Executive Director for Operations, to the Secretary of the Commission, or to the Inspector General, U.S. Nuclear Regulatory Commission, Washington, DC 20555, and should clearly state on the envelope and in the letter that it is an "Appeal from an Initial FOIA Decision."

APPENDIX D

RECORDS MAINTAINED IN THE PDR UNDER THE ABOVE REQUEST NUMBER

<u>Number</u>	<u>Date</u>	<u>Subject</u>	<u>Number of Pages</u>
1.	1989	Percentage of overtime worked since 1 January 1989	3
2.	5/2/90	Note from Anonymous to Mr. Bridenbocker re: operator attrition.	3
3.	4/24/90	Note from Anonymous to Russ Krieger re: poor morale and stress.	3
4.	10/30/89	Note from Anonymous to L. Cash, re: overtime.	2
5.	10/30/89	Note from Confidential to R. Krieger, re: shift schedules.	2
6.	1989	Health Physics Policy Statement 11-3, Rev. 2 Effective 8/89	3
7.	10/11/89	Percentage of overtime worked from: December '88 to September '89	4
8.	11/30/88	Policy Statement	2
9.	1987	Hours worked normal/overtime	2
10.	3/19/50	Note from M. Cooper to All Operator re: Outage Schedule	1
11.	1/18/90	Ltr from H. Ray to R. Zimmerman, re: The Impact of Outage-Related Overtime	2
12.	3/16/88	Rev 2 - Implementation of Overtime	20
13.	12/24/87	Routing & Document Control - Implementation of Overtime Restrictions	3
14.	5/2/91	Memorandum for Commissioner Curtiss from James M. Taylor, subject: "Overtime by Reactor Operators and Information on Personnel Error Rate."	2

Re: FOIA-91-521

APPENDIX E

DOCUMENTS BEING RELEASED IN PART

NUMBER	DATE	DESCRIPTION
1.	1989	Bi-Weekly Time Sheets, (65 pgs.) - EXEMPTION 6.

83 From: [VAN FISHER] at WEST2 11/8/89 7:31 AM (68204 bytes: 131 ln, 4 gr)
o: NRC at AWS4
c: [RUSS KRIEGER] at AWS
subject: Overtime Report-October

*Release
R/S*

----- Forwarded with Changes -----
83 From: [VAN FISHER] at WEST2 11/8/89 7:21 AM (68204 bytes: 131 ln, 4 gr)
o: NRC at AWS4
c: [RUSS KRIEGER] at AWS
subject: Overtime Report-October

----- Forwarded with Changes -----
from: [MARTIN COOPER] at WEST2 11 7/89 4:22PM (67836 bytes: 127 ln, 4 gr)
o: [VAN FISHER, DON LOKKER] at WEST5, [THEODORE VOGT] at WEST5
subject: Overtime Report-October

----- Message Contents -----
ext item 1: Data

Mr. Hon - per your request. *[Vand]*

he overtime since Jan. 1, 1989 is running at 18.8 % for the thru the end of his reporting period based on

total normal time hours worked = 312230 hours
total overtime = 56739 hours
56739/312230 = 18.1%

Bases: 95% of all OPS 2/3 time cards went into report figures.

October Overtime 3

10-08-89 to 11-05-89 324 timecards x 80 = 25,920 hrs.
total overtime = 11,541 hrs.
doubletime = 1934.0 hrs.
hours paid not worked (sick/vac/hol/etc.) = 2688 --hrs.

B/A = % O/t x 44.0% (doubletime = C/A = %) 7.5%

D/A = % 10.3% time not worked percentage

September Overtime

09-11-89 to 10-08-89 328 timecards x 80 = 26,240 hrs.
total overtime = 10,852
doubletime = 1805 hrs.
hours paid not worked (sick/vac/hol/etc.) = 1963 hrs.

10,852/26240 = 41% (doubletime = 6.8%)

1963/26,240 = 7.5%

August Overtime

07-31-89 to 9-10-89 507 timecards x 80 = 40,560 hrs.
total overtime = 7,200 hrs.
doubletime = 738 hrs.
hours paid not worked (sick/vac/hol/etc.) = 5,023 hrs.

7200/40560 = 17.8% (doubletime = 1.8%)

5,023/40,560 hrs. = 12.4% not worked percentage

July Overtime

07-03-89 to 07-30-89 341 timecards x 80 = 27,280 hrs.
total overtime = 3,921.5 hrs.

D/1.

hours paid not worked (sick/vac/hol/etc.) = 4,449 hrs.

$3921.5/27,280 = 14.4\%$ (doubletime=1.1%)

$4,449/27,280 = 16.3\%$ not worked percentage

June Overtime

06-05-89 to 07-02-89 333 timecards x 80 = 26,640 hrs.
total overtime = 3,950.5 hrs.
doubletime = 516.75hrs.
hours paid not worked (sick/vac/hol/etc.) = 2,538.2 hrs.

$3950.5/26,640 = 14.8\%$ (doubletime=1.9%)

$2598.2/26,640 = 9.75\%$ not worked percentage

May Overtime

04-24-89 to 6-04-89 512 timecards x 80 = 40960 hrs.
total overtime = 6743 hrs.
doubletime = 700.5 hrs.
hours paid not worked (sick/vac/hol) = 3579.75 hrs.

$6743/40,960 = 16.5\%$ (doubletime=1.7%)

$3579.75/40960 = 8.7\%$ not worked percentage

April Overtime

03-27-89 to 4-23-89 344 timecards x 80 = 27,520 hrs.
total overtime = 3,887 hrs.
doubletime = 596 hrs.
hours paid not worked = 2314 hrs.

$3887/27,520 = 14.1\%$ (doubletime=2.1%)

$2314/40960 = 8.4\%$ not worked percentage

March Overtime

02-27-89 to 03-26-89 352 timecards x 80 = 28,160 hrs.
total overtime = 2743 hrs.
doubletime = 247 hrs.

$2743/28,160 = 9.7\%$ (doubletime=.88%)

February Overtime

01-30-89 to 02-26-89 357 timecards x 80 = 28,560 hrs.
total overtime = 3127 hrs.
doubletime = 384 hrs.

$3127/28,560 = 10.9\%$ (doubletime=1.3%)

January Overtime

01-01-89 to 01-29-89 506 timecards x 80 = 29,800 hrs.
total overtime = 2774 hrs.
doubletime = 287 hrs.

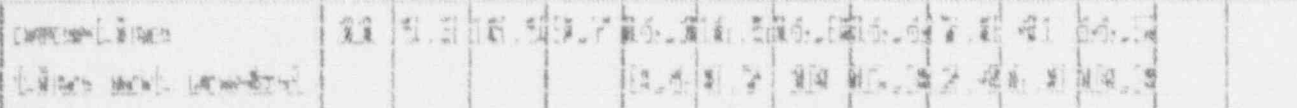
$2774/29,800 = 9.3\%$ (doubletime=.96%)





December '88 Overtime

12-05-88 to 12-31-88 320 timecards x 80 = 24,300 hrs.
total overtime = 2662 hrs.
of which is doubletime = 233 hrs.

$2662/24,300 = 10.95\%$ (doubletime=.95%)

王明賢



Relax
MS

SCANDAL INQUIRY PROGRAM (SIP)

SIP No. 0-007 (0-007-0001)

QUESTION/COMMENT:

Mr. Bridenbaker:

Sir: I know that you have probably been inundated with SIPs lately regarding the attrition problem in Operations Unit 2. I apologize for adding one more SIP to the list; however, given your recent decision to freeze all Operations 2/3 bargaining unit employees out of the JDIS process, I trust this will not be the last SIP addressed to you on this matter.

As you are no doubt aware, this is not the first time Management has resorted to a freeze to stabilize its Operations work force.

This is a recurring problem, and there are many of us (operators) who feel as if the real problems in the department are not being focused on. We are all well aware that certain liabilities; such as forced overtime, stress, changing schedules, job safety hazards, and shift rotation are inherent to the job. However, we are just as aware that other areas; such as, unreasonable pay, poor supervision, and insensitive management are not endemic to the job and are all places where dramatic improvement can be effected and, thereby, ameliorate the necessary conditions listed above.

My questions are: what is your (Management's) perspective on why Operations 2/3 is experiencing such an "unusually" high attrition rate, and what, if any, other alternatives (besides the freeze) are being considered to solve this problem?

RESPONSE:

Thank you for your inquiry. Based on my assessment of the attrition experienced during 1989, enhanced career opportunities and higher pay for comparable work appear to be underlying motives for most of the operator attrition.

Δ/2

Operators are highly trained and have marketable skills which are likely to be a factor in the attrition moving to other positions in the Corporation and strengthened these organizational. However, recent interviews of a large cross-section of operators indicate that other factors, including those you note above, are contributing to attrition for some of the attrition.

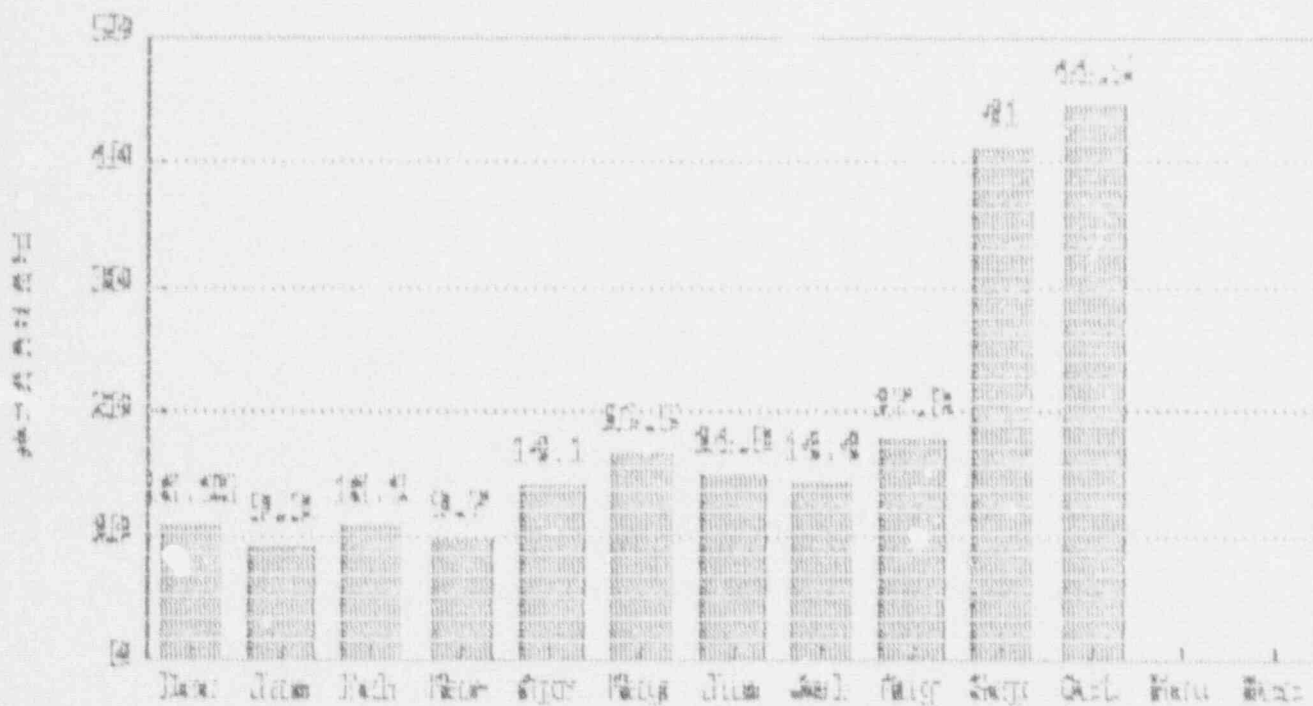
During the recently completed Professional Operators Development and Evaluation Program workshops, the results of these interviews were discussed in general, and a commitment was made to work together to address the issues and concerns expressed by the operators which are contributing to poor morale and attrition. Crew meetings will be scheduled in the near future to meet this commitment.

I intend to closely monitor the progress of these crew meetings, including actively participating in some of them, in order to assure that the issues and concerns expressed by you and the other operators receive the proper attention.

ROBERT M. BRIDENBECKER

May 3, 1990

OPS 2/3 Overtime Oct. '99

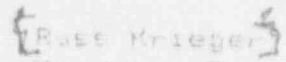


10/1/99

Personnel Center Line

2. A large cross-section of operators have been interviewed by a consultant to identify the working conditions and the issues and concerns which are contributing to poor morale and stress. The results of these interviews have been documented and crew meetings will be scheduled in the near future to review these results.
3. A review of the compensation standards relative to the industry is underway and will be completed in the near future. This review will look at a variety of factors such as the actual rates for comparable jobs, the current economic conditions both locally and nationally, the local and national labor markets and the economic predictions for the near future. One of the primary objectives the Company has always had is to keep our compensation standards competitive within the industry that attract, retain and motivate employees.

As indicated at the Professional Operator Development and Evaluation Program workshops, we intend to work together to turn around the poor morale and stress within the Operations Division.


Manager, Operations

April 24, 1990

Subject: SIP A-260 (Anonymous) - Allotment of Overtime in Maintenance

----- Message Contents -----

SONGS INQUIRY PROGRAM (SIP)

SIP No. A-260 (Anonymous)

QUESTION/CONCERN:

I am a Maintenance craft worker and was recently told that the Maintenance Engineering Procedures Group has been on overtime for the last 2-3 years working a minimum of 50 hour work weeks.

Don't the Maintenance Engineering and Maintenance Craft/Line personnel come under the same budget? (In other words, aren't we all part of the same SONGS Maintenance Division)? If we are all under the same budget, then all overtime should be controlled the same way don't you think?

Most line personnel and other divisions say they have large work loads here at SONGS, yet not all divisions are put on blanket overtime, even though they could often probably use it.

I understand overtime is given on a priority and work load basis (case by case situation) but it seems odd that one division consistently and easily gets overtime, while others have to fight for it.

What warrants all this permanent overtime? Is it vital to the operation and continued operation of the plants? Is it all that necessary during non outage periods?

RESPONSE:

As a Maintenance craft worker, the amount of overtime you work is governed by the "Agreement" between the Company and the Union and the NRC overtime guidelines.

Overtime assigned to the Maintenance Procedures Group is based on priority, backlog and manpower resources. There is no blanket approval for overtime as you imply.

Overtime worked by the Maintenance Procedures Group is normally paid for out of the Maintenance budget. Frequently normal time and overtime are approved for capital work projects, such as DCPs that are funded from other budgets, not the Maintenance budget.

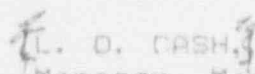
D/4.

It is true that the Maintenance Procedures Group as a whole works a significant amount of overtime, but individually this may not be the case. Depending on the discipline, some individuals may work a lot of overtime, while others work little or none.

The Maintenance Procedures Group is a relatively small group. During the past year several procedures personnel left our organization for various reasons. Such attrition quickly and significantly affects the work load of the remaining personnel. In addition, procedures personnel are regularly assigned duty with line organizations during refueling outages. This also reduces available manpower and increases the backlog. These events tend to increase the need to work overtime.

Management is aware of all of the above conditions and is taking measures to reduce overtime as a matter of principle.

Thank you for your inquiry.


L. D. CASH
Manager, Maintenance

October 30, 1989

0223 From: SENSE NEWS12 10/30/89 11:32PM (2467 bytes: 1- 1n)
Subject: SIP C-67 (Confidential) - Operations 2/3 Excessive Hours

----- Message Contents -----

POSTED WITH INQUIRER'S PERMISSION

SENSE INQUIRY PROGRAM (2/19)

SIP No. C-67 (Confidential)

QUESTION/CONCERN:

During this Unit 2 refueling outage, the Operations 2/3 people are forced to work 10 weeks of 12 1/2 hour days because there aren't enough people. However, on Mondays there is an extra shift on, so we have more than 30 extra people that day. These people are threatened with dirty jobs if they ask to go home after 8 hours.

They are told it is too complicated to figure out a way to fairly allow people to go home after 8 hours, and keep the people they need for 12 hours.

I'm sure everyone understands how stressful it is to work 10 weeks of forced 12 1/2 hour days. Here is a perfect opportunity to alleviate some of this stress, and because Operations 2/3 supervision says it is too complicated, over 30 people, who aren't really needed, are forced to work 12 1/2 hours on Mondays.

Is this good management?

RESPONSE:

Thank you for your inquiry. As you note above, the current shift schedule results in an overlap between crews on Mondays. This schedule was selected to optimally support the Unit 2 refueling outage and the continued operation of Unit 3. When the overlap occurs, we are able to effectively utilize the additional resources to concentrate on areas such as housekeeping, training, signage, etc. As you know, these areas are important to our continued success.

To my knowledge, people aren't threatened with dirty jobs if they ask to go home after 8 hours and it isn't overly

D/5

complicated to figure out a way to fairly allow people to go home after 8 hours. If you are interested in taking time-off from the current shift schedule, you must submit your request to supervision in accordance with established policy.

Russ Krieger
Manager, Operations

October 30, 1989

HEALTH PHYSICS POLICY STATEMENT II-3, Rev. 2
EFFECTIVE 8/89

TITLE: OVERTIME

PURPOSE: To provide guidelines for offering overtime, within the limits of the Station Procedures and the UWUA Contract.

RESPONSIBILITY TO EXECUTE: Health Physics Supervision

1.0 INTRODUCTION:

Supervision shall ensure that all overtime is assigned in a fair manner consistent with Division needs, the Working Agreement, and Station Procedures.

2.0 ACTION RULES:

2.1 Health Physics Technicians and their first-line supervisors are restricted by SO(123)-XXII-5.2 as to the amount of overtime that may be worked.

2.2 Overtime should be divided as equally as practical among those qualified and available.

2.2.1 The offering supervisor shall determine in each case who is qualified and available.

2.2.2 Personnel assigned to NTD are generally considered available for overtime assignments, and should be included in all offerings that will not interfere with class schedules.

2.3 Overtime shall be offered in accordance with the following guidelines:

2.3.1 Twenty-four hours advance notice for four or less than four hours.

2.3.2 Seventy-two hours advance notice for more than four hours.

3.0 OVERTIME RESTRICTIONS:

3.1 The provisions of SO(123)-XXII-5.2 shall apply to all overtime offerings to Health Physics Technicians and their first line supervisors.

0/6

- 3.2 In no case should sections 6.2.1-6.2.3 of the referenced procedure be deviated from by any Health Physics personnel:

No person should work more than 16 hours without a break, or more than 16 hours in a 24 hour period, or more than 24 hours in a 48 hour period, or more than 72 hours in any 7 consecutive days; there should be an 8 hour break between each work period.

Definitions of work periods are located in the procedure.

4.0 OFFERING OVERTIME TO BARGAINING UNIT EMPLOYEES:

- 4.1 All overtime offerings to Bargaining Unit employees shall be made by using the current combined Evergreen Report as produced and distributed by Payroll. Use the current Evergreen list until an updated one is received (every payday Friday).

- 4.2 For those work groups working a fixed shift as defined by a Section M agreement, divide the Evergreen Report into shifts.

- 4.3 To fill a vacancy on a shift, offer in the following order:

- 4.3.1 offer the OT to those persons on that same shift who will be on an RDO,

Note: If personnel eligible for overtime are not at work when offering is made (i.e. home, medical, training), contact them by reasonable means and document. This is to be done even when it will result in double time rate payment.

- 4.3.2 offer IE's and HO's as necessary to persons working that day on adjacent shifts,

- 4.3.3 offer the vacancy to persons on adjacent shifts who will be on an RDO,

- 4.3.4 offer to persons eligible for upgrade into the classification in which the overtime assignment is available (i.e., offer SRMH vacancies to upgradable RMHs, etc.).

4.3.5 offer to contractors qualified and available.

If the positions remain unfilled after steps 1-4, make assignments in the following order:

4.3.5, 4.3.2, 4.3.1, 4.3.3 (see above).

4.4 To fill an extended hours position:

4.4.1 offer HO's as necessary for the duration that the job is forecast to last, in evergreen order, to the on-shift personnel qualified and available to work, except for reasons of job continuity, which can be offered first to the persons involved with the job.

4.4.2 Job continuity offers should be limited to "short duration" jobs; any work not of a "job continuity" nature shall be offered in evergreen order.

5.0 DOCUMENTATION (FOR BARGAINING UNIT PERSONNEL):

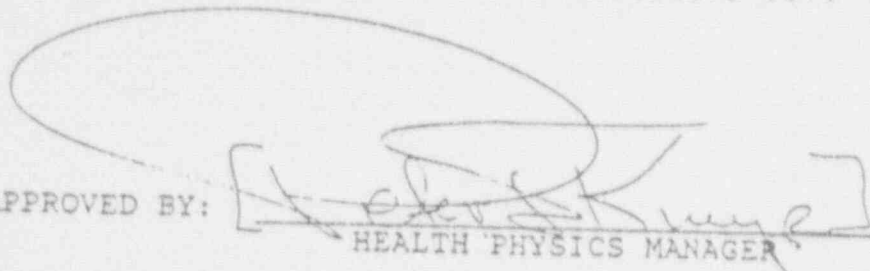
- 5.1 For OT worked by Health Physics personnel and their first line supervisors, follow the requirements in the referenced procedure.
- 5.2 For all overtime offered, keep a written record of the offering, detailing the offer, to whom, and the results, i.e. accepted, declined, etc. This record should be retrievable for reference if necessary.
- 5.3 Using an Aigner Form #65-208 or equivalent, enter the names of all personnel qualified for the offering, in evergreen order.
- 5.4 Enter the details of the offering (when, where, duration, number of positions).
- 5.5 Offer the determined number of positions per the combined Evergreen Report and document results, i.e., accept or decline.
- 5.6 Keep these records in a notebook in the Foreman's office.

II-3-2-8/89

6.0 OVERTIME ELIGIBILITY FOR MANAGEMENT EMPLOYEES:

6.1 Overtime for Management employees should be in accordance with NGS Directive 007.

APPROVED BY:


HEALTH PHYSICS MANAGER

Date:

8/1/89

291 From: [JAN 11/89] at WEST2 10/11/89 11:56AM (61574 bytes: 111 ln, 4 gr)

o: NRC at AWS

c: RUSS KRIEGER at AWS, PATRICK SHAFFER at AWS2

subject: Overtime Report-September

----- Forwarded with Charges -----

from: MARTIN COOPER at WEST5 10/11/89 10:28AM (61574 bytes: 111 ln, 4 gr)

o: VAN FISHER at WEST2, DON LOKKER, THEODORE VOGEL

c: FRANK GILMORE

subject: Overtime Report-September

----- Message Contents -----

ext item 1: Data

Mr. Hon - per your request. [Van]

Exes: >95% of all OPS 2/3 time cards went into report figures.

September Overtime

09-11-89 to 10-08-89 (328) timecards x 80 = 26,240 hrs.

total overtime = 10,852

doubletime = 1805 hrs.

hours paid not worked (sick/vac/hol/etc.) = 1963 hrs.

$10,852/26,240 = 41\%$

(doubletime= 6.8%)

$1963/26,240 = 7.5\%$

August Overtime

07-31-89 to 9-10-89 (507) timecards x 80 = 40,560 hrs.

total overtime = 7,200 hrs.

doubletime = 738 hrs.

hours paid not worked (sick/vac/hol/etc.) = 5,023 hrs.

$7200/40,560 = 17.8\%$

(doubletime=1.8%)

$5,023/40,560 \text{ hrs.} = 12.4\% \text{ not worked percentage}$

July Overtime

07-03-89 to 07-30-89 (341) timecards x 80 = 27,280 hrs.

total overtime = 3,921.5 hrs.

doubletime = 322 hrs.

hours paid not worked (sick/vac/hol/etc.) = 4,449 hrs.

$3921.5/27,280 = 14.4\%$

(doubletime=1.1%)

$4,449/27,280 = 16.3\% \text{ not worked percentage}$

June Overtime

06-05-89 to 07-02-89 (333) timecards x 80 = 26,640 hrs.

total overtime = 3,950.5 hrs.

doubletime = 516.75hrs.

hours paid not worked (sick/vac/hol/etc.) = 2,598.2 hrs.

$3950.5/26,640 = 14.8\%$

(doubletime=1.9%)

$2598.2/26,640 = 9.75\% \text{ not worked percentage}$

May Overtime

04-24-89 to 5-04-89 (512) timecards x 80 = 40960 hrs.

total overtime = 6743 hrs.

doubletime = 700.5 hrs.

hours paid not worked (sick/vac/hol) = 3579.75 hrs.

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3579.75/40960 = 8.7% not worked percentage

April Overtime

03-27-89 to 4-23-89 344 timecards x 80 = 27,520 hrs.
total overtime = 3,887 hrs.
doubletime = 596 hrs.
hours paid not worked = 2314 hrs.

3887/27,520 = 14.1% (doubletime=2.1%)

2314/40960 = 8.4% not worked percentage

March Overtime

02-27-89 to 03-26-89 352 timecards x 80 = 28,160 hrs.
total overtime = 2743 hrs.
doubletime = 247 hrs.

2743/28,160 = 9.7% (doubletime=.88%)

February Overtime

01-30-89 to 02-26-89 357 timecards x 80 = 28,560 hrs.
total overtime = 3127 hrs.
doubletime = 384 hrs.

3127/28,560 = 10.9% (doubletime=1.3%)

January Overtime

01-01-89 to 01-29-89 506 timecards x 80 = 29,800 hrs.
total overtime = 2774 hrs.
doubletime = 287 hrs.

2774/29,800 = 9.3% (doubletime=.96%)

December '88 Overtime

12-05-88 to 12-31-88 320 timecards x 80 = 24,300 hrs.
total overtime = 2662 hrs.
of which is doubletime = 233 hrs.

2662/24,300 = 10.95% (doubletime=.95%)

Time not	April	2314	Hours
worked:	May	3579.5	
	June	2598.2	
	July	4449	
	August	5023	

17963.7 Hours (for 5 months)

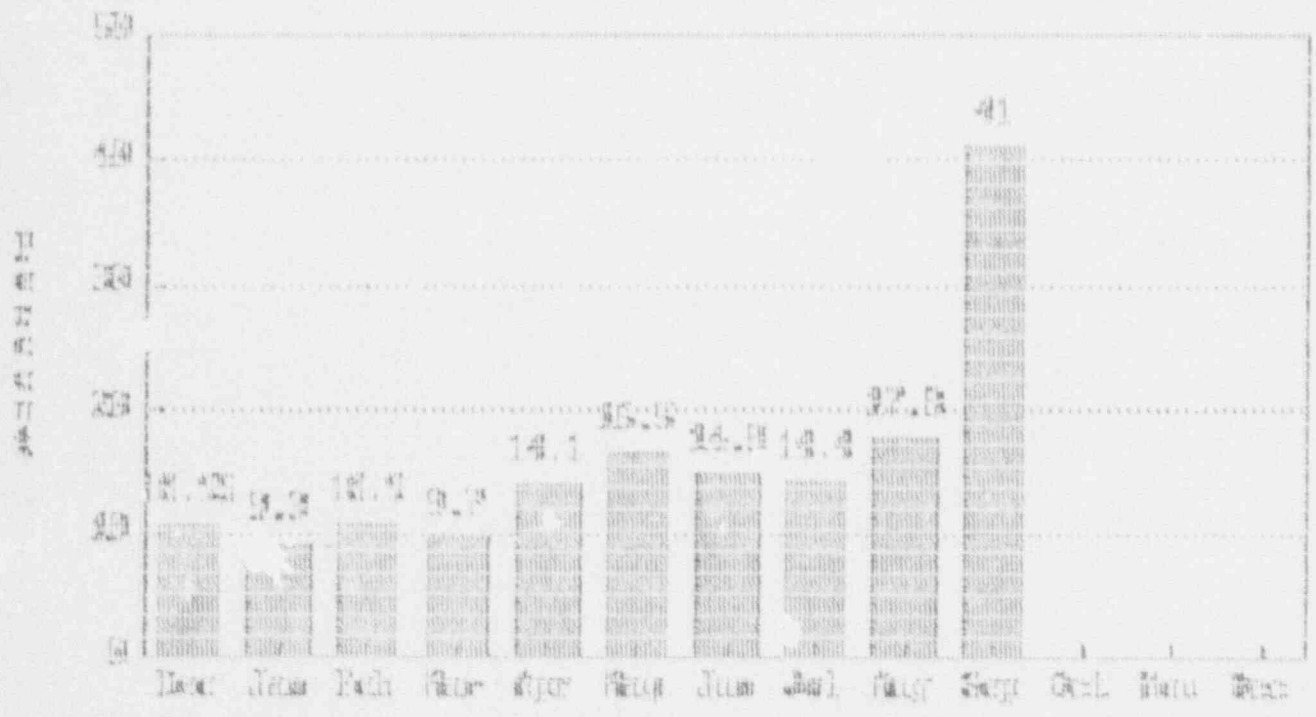
Avg. per month: 17963.7/5 = 3592.74 Hours per month

Extrapolated to annual time not worked:

3592.74 * 12 months = 43112.88 hours

With 2 weeks vacation per employee each worker works 2000 hours
per year: 43112.88 hours / 2000 hours/employee = 21.56 employees
extra needed to cover for time off.

03 2/3 Over Time Sep. 89



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Thermal Control



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POLICY STATEMENTS

litigate whatever they wish and it would be "useful" or "helpful" to address certain questions.

Throughout the development of the TMI Action Plan and the various policy statements, I have believed the Commissioners should play a central role in determining the appropriate response to the TMI-2 accident. Unfortunately the "Revised Statement of Policy" relinquishes Commission control and attention from a major portion of this process. Therefore I would have preferred the following approach:

Revised Statement of Policy

I. Background

In June 1980 the Commission issued a Statement of Policy dealing with TMI-related requirements for new operating licenses.¹ This statement outlined the process by which the Commission evaluated the TMI-2 accident and then agreed in a list of requirements to be adopted in response to the accident.² It then provided guidance for litigation of TMI-2 issues in operating license proceedings.

Subsequently substantial controversy developed over the statement—particularly over treatment of requirements and issues which go beyond existing regulations. Due in part to this controversy, in part to a change in the composition of the Commission, in part to the uncertain results of ongoing litigation, and in part to confusion created by subsequent Commission statements, the Commission has decided to modify this aspect of the policy statement. In the long run the Commission believes it will save time by modifying its guidance at this juncture.

II. Modified Commission Guidance of Litigation on TMI-2 Issues in Operating License Proceedings

In the June Statement of Policy the Commission described the TMI-related requirements as falling into two categories: "(1) Those that interpret, refine or quantify the general language of existing regulations, and (2) those that supplement the existing regulations by imposing requirements in addition to specific ones already contained therein." The Commission is modifying its guidance with respect to the second category. Rather than entirely precluding litigation of requirements that go beyond the regulations (other than those found in the Commission's list of requirements), the Commission will now provide parties an opportunity to certify such questions to the

Commission. To the extent that an issue addresses items within the current regulations, certification is unnecessary since litigation was permissible under the original policy statement. However, issues which raise matters going beyond the existing regulations may now be certified directly to the Commission.³

A request for certification should clearly present (a) the nexus of the issue to the TMI-2 accident (i.e., in what way does the TMI accident provide a basis for the concerns presented); (b) the significance of the issue (i.e., what is the consequence of not addressing the issue); (c) to the extent possible, the differences in rationale underlying the certification from the rationale underlying the Commission consideration of additional TMI-related requirements (e.g., different reasoning, incorrect assumptions, incomplete information).

To the extent that a contention raises the need for a requirement already included in the Commission's list of requirements for new operating licenses, certification is unnecessary. As under the old policy statement, litigation of the need for those requirements is permitted without further action by the Commission. The Commission itself has already found sufficient basis for allowing consideration of those items.

It should be emphasized that this policy statement (as well as the previous policy statement) is intended to address issues arising from the TMI-2 accident. Other issues are to be treated according to normal Commission procedures.⁴

46 FR 23836
Published 6/1/82

Nuclear Power Plant Staff Working Hours

AGENCY: Nuclear Regulatory Commission.

ACTION: Publication of revised policy regarding nuclear power plant staff working hours.

SUMMARY: On February 11, 1982, the Nuclear Regulatory Commission published a "Policy on Factors Causing Fatigue of Operating Personnel at Nuclear Reactors." 47 FR 7352.

Comments received since publication have revealed questions concerning the policy statement. Accordingly, the policy statement has been revised and the revised version is reproduced below. Changes include: (1) The addition of a sentence which explicitly states that the objective of the working hour policy is to have operating personnel work an 8-hour day, 40-hour week; (2) The addition of a phrase to indicate that the stated working hour restrictions are applicable

during extended periods of shutdown for refueling, major maintenance or major plant modifications; and (3) The addition of a phrase exempting extended shutdown periods from the requirements to consider use of overtime only on an individual basis.

Policy on Factors Causing Fatigue of Operating Personnel at Nuclear Reactors

Licensees of operating plants and applicants for operating licenses shall establish controls to prevent situations where fatigue could reduce the ability of operating personnel to keep the reactor in a safe condition. The controls should focus on shift staffing and the use of overtime—key job-related factors that influence fatigue.

The objective of the controls would be to assure that, to the extent practicable, personnel are not assigned to shift duties while in a fatigued condition that could significantly reduce their mental alertness or their decision making capability. The controls shall apply to the plant staff who perform safety-related functions (e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel).

Enough plant operating personnel should be employed to maintain adequate shift coverage without routine heavy use of overtime. The objective is to have operating personnel work a normal 8-hour day, 40-hour week while the plant 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:

a. An individual should not be permitted to work more than 16 hours straight (excluding shift turnover time).

b. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period nor more than 72 hours in any seven day period (all excluding shift turnover time).

c. A break of at least eight hours should be allowed between work periods (including shift turnover time).

d. 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.

Recognizing that very unusual circumstances may arise requiring deviation from the above guidelines, such deviation shall be authorized by the plant manager or his deputy, or higher levels of management. The

¹ "Further Commission Guidance for Power Reactor Operating Licensee's Statement of Policy," 45 FR 41738 (June 23, 1980).

² "TMI-Related Requirements for New Operating Licenses," NUREG-0606 (June 1980) as modified by "Clarification of TMI Action Plan Requirements," NUREG-0737 (Nov. 1980).

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POLICY STATEMENTS

paramount consideration in such authorization shall be that significant reductions in the effectiveness of operating personnel would be highly unlikely.

In addition, procedures are encouraged that would allow licensed operators at the controls to be periodically relieved and assigned to other duties away from the control board during their tour of duty.

FOR FURTHER INFORMATION CONTACT:
Mr. Lawrence P. Crocker, (301) 492-8357.

Dated at Bethesda, Maryland, this 25th day of May, 1988.

For the Nuclear Regulatory Commission,
John A. Zwolinaki,
*Acting Chief, Licensee Qualifications Branch,
Division of Human Factors Safety.*

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OCT. 1967 OVERTIME FOR OPS 2/3 WAS APPROX. 15.0% TOTAL
 OF WHICH 1.0% WAS DOUBLE TIME

REPORT
 -TOTAL NORMAL TIME HOURS IN REPORT-----40,300
 -TOTAL OVERTIME HOURS (1.5X)-----3,16
 -TOTAL DOUBLE TIME HOURS-----16
 -PERIOD COVERED BY THIS REPORT-----7-20-1-31

OCT. 1967 OVERTIME FOR OPS 2/3 WAS APPROX. 15.0% TOTAL
 OF WHICH 1.0% WAS DOUBLE TIME

REPORT
 -TOTAL NORMAL TIME HOURS IN REPORT-----41,686
 -TOTAL OVERTIME HOURS (1.5X)-----4,067
 -TOTAL DOUBLE TIME HOURS-----377
 -PERIOD COVERED BY THIS REPORT-----8-25-1-31

OCT. 1967 OVERTIME FOR OPS 2/3 WAS APPROX. 15.0% TOTAL
 OF WHICH 1.0% WAS DOUBLE TIME

REPORT
 -TOTAL NORMAL TIME HOURS IN REPORT-----20,400
 -TOTAL OVERTIME HOURS (1.5X)-----4,067
 -TOTAL DOUBLE TIME HOURS-----377
 -PERIOD COVERED BY THIS REPORT-----9-20-1-31

NOV. 1967 OVERTIME FOR OPS 2/3 WAS APPROX. 17.6% TOTAL
 OF WHICH 2.7% WAS DOUBLE TIME

REPORT
 -TOTAL NORMAL TIME HOURS IN REPORT-----25,550
 -TOTAL OVERTIME HOURS (1.5X)-----4,067
 -TOTAL DOUBLE TIME HOURS-----700
 -PERIOD COVERED BY THIS REPORT-----10-21-1-31

D/9.

PRIME JONES

March 19, 1990

To: All Operators

Subject: Outage Schedule

The upcoming Outage and the method to be used in Operations to support Schedule is a topic of vital interest to each of you, and I apologize for the delay in getting the word out to you about the details on how we will staff for this Outage. In an effort to reduce the amount of Overtime being worked by operators, we have had to modify some of the methods that we have used successfully in the past.

When the Outage starts, "C" crew personnel will be reassigned to the other 4 crews or other Outage related jobs. We will be scheduling 4 Primary Auxiliaries and 3 Secondary Auxiliaries, forcing to maintain 3 and 2. Vacancies that occur in shift staffing due to vacation, illness, etc. will be covered by overtime to maintain minimum outage staffing. The filling of the HFMUD (45) position will be done via overtime. After shutdown of the Secondary Plant, the FFCPD (35) position will be secured.

License class 283-2 will return to shift for 3 weeks on May 11. This should greatly reduce the amount of overtime required to maintain the minimum number of auxiliaries. They return to training on June 4 for final training and NRC licensing. At that time (June 4), the crews will go on 12 hour shifts. They will be working 5 on, 2 off for 4 weeks with an approximate end on or about June 30. This will provide the required staffing levels for ESF testing and bringing the plant up in modes. While on 12's, "E" crew personnel will be distributed amongst the other 3 crews. 12 hour shifts will end on or about June 30. Previously approved vacations are reflected on the schedule. Please submit requests to readjust your vacation as necessary due to the changes in the crew schedule. Every effort will be made to accommodate your needs.


M. V. Cooper

MVC009:jkg

D/10

J/R/A ASSOCIATES
Regulatory Information & Support Systems
1407 Marco Drive
Mitchellville, MD 20721

301/ 249-9672

November 21, 1991
OGW-91-135

Mr. Donnie H. Grimsley, Director
Division of Freedom of Information and
Publications Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

FREEDOM OF INFORMATION
ACT REQUEST

SUBJECT: FREEDOM OF INFORMATION ACT REQUEST

FOIA-91-521
Rev'd 11-22-91

Dear Mr. Grimsley:

Pursuant to the Freedom of Information Act, 5 U.S.C. Paragraph 552 and NRC's policies and regulations, 10 CFR Part 9, Subpart A, I request copies of all internal NRC documents related to the development, review, approval, and issuance of NRC Information Notice 91-36, "Nuclear Plant Staff Working Hours," issued on June 10, 1991.

If all or any part of this request is denied, please cite the specific exemption(s) which you think justifies your refusal to release the information. I would appreciate your prompt response within ten working days of the receipt of this request, as provided by the law and NRC's regulations. I agree to pay such fees as required under 10 CFR Paragraph 9.33 et seq for the search, review, and provision of such records.

Thank you for your assistance.

Sincerely,


Ophelia G. Williams

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