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June 4, 1997
6730-97-2175

U. S. Nuclear Regulatory Commission
Region I
174 Allendale Road
King of Prussia, PA 19055

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Calculating On-Shift Hours to Maintain Senior Reactor Operator (SRO)
Qualifications

The purpose of this memo is to inform you that on May 14, 1997, Oyster Creek initiated the "Fix It Now" Maintenance team. The team was formed to reduce disruption of scheduled maintenance and aid in the efficient use of maintenance resources. This group is headed by an active SRO who is assigned to this position in addition to the Technical Specification required position. The duties of the "Fix It Now" Coordinator are no different than those of SRO's serving in Technical Specification required positions. These duties include identifying daily priorities and approving work activities, as well as, supervising the activities of the "Fix It Now" team.

It is our understanding, based upon discussions with NRC staff, that up to half credit for the hours spent as "Fix It Now" Coordinator can be applied to the 10 CFR 55.51 requirement of fifty-six (56) hours per calendar quarter of actively performing the functions of an SRO in order to maintain active status. The remaining twenty-eight (28) hours will be spent dedicated to a shift and filling a technical specification required position.

In addition to the "Fix It Now" Coordinator position, we are requesting that the same allowance be applied to both the Plant Operations Director position and the Work Control Center Coordinator position. The Plant Operations Director monitors and oversees all plant activities and is required by the Oyster Creek Technical Specifications to be SRO qualified. He is involved with both short term and long term issues. Maintaining an active SRO license would allow this individual even more time directly supervising Control Room activities.

The Work Control Center Coordinator is responsible for scheduling, reviewing and approving switching and tagging requests as well as reviewing and approving incoming work activities.

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All of the above individuals and positions are required to maintain a cognizance of current plant conditions and status. As such, their daily responsibilities and accountabilities are consistent with maintaining an active license status and deserve credit for on-shift time. Requiring individuals filling these positions to serve an additional fifty-six hours to maintain active license status results in an unnecessary burden and limits scheduling flexibility.

Your prompt reply would be appreciated.

Very truly yours,



Michael B. Roche
Vice President and Director
Oyster Creek

MBR/BDE

CC: Administrator, Region I
NRC Project Manager
NRC Resident Inspector
Mr. Glenn W. Meyer, Chief Operator Licensing & Human Performance Branch
Division of Reactor Safety