



BOSTON EDISON

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

Ralph G. Bird
Senior Vice President — Nuclear

June 15, 1988
BECO Ltr. #88-092

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Docket No. 50-293
License No. DPR-35

Subject: NRC Inspection Report 50-293/88-07 (Overtime Controls)

Dear Sir:

Attached is Boston Edison Company's response to the overtime concerns (UNR 88-07-03) described in the subject inspection report.

Overtime controls at Pilgrim Station have been established which include preauthorization of planned overtime, restrictions on repetitive overtime by the same individual, and auditable reports which indicate performance regarding the overtime policy.

Per discussion on June 7, 1988 with Mr. R. Blough (NRC Region I) it was agreed that Boston Edison Company's response regarding the overtime concerns would be submitted by June 15, 1988.

Please do not hesitate to contact me directly if there are further questions or comments regarding this matter.


R.G. Bird

BL/bl

Attachment: Response to Overtime Concerns UNR 88-07-03

cc: Mr. William Russell
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Rd.
King of Prussia, PA 19406

Sr. Resident Inspector - Pilgrim Station

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ATTACHMENT

Response to Overtime Concerns UNR 88-07-03

(Inspection Report 88-07)

Boston Edison Company's (BECo) response to the allegation of excessive overtime dated October 28, 1987, concluded that overtime controls were being effectively implemented and were consistent with the intent of NRC guidance. This assessment was based on a review of payroll records for the period of August 30, 1987 through October 3, 1987. Our assessment of this data considered that;

- ° payroll records can indicate hours in excess of actual hours worked due to time documentation practices which reflect pay clauses imposed by certain labor contracts.
- ° payroll records include shift turnover time which is exempted from consideration as hours worked in Generic Letter 82-12.

Our conclusion in the October 28, 1987 letter was based on;

- ° the process for approval and documentation of overtime was in place and functioning, and approvals and records found missing did not substantially degrade the process.
- ° reviews did not identify evidence which would indicate that personnel were assigned duties while in a fatigued condition.
- ° in the area of most concern, reactor operators, we aggressively controlled overtime within the guidelines.

Subsequent discussion between the NRC and Boston Edison identified a difference in understanding of the controls needed to meet the intent of NRC overtime guidelines. In light of our present understanding, the deficiencies we found in our October 1987 audit would not now be considered acceptable to Boston Edison management. The difference in understanding has been resolved as evidenced by the present overtime control program in place at Pilgrim Station. This program now applies the overtime controls to maintenance and other safety related work at the Station, as rigorously as we had formerly applied them to operators. The existing program has been reviewed and meets the guidelines promulgated in Generic Letters 82-12 and 83-14 as noted in the cover letter of Inspection Report 50-293/88-07. Procedures formalizing the existing program will be published within a month.

Pilgrim's overtime controls for station personnel now specify preauthorization on an individual basis for planned overtime in excess of the established guidelines except for overtime involving an emergency or urgent issue (e.g. snowstorm, last minute shift coverage problem, or critical equipment problem). Overtime is authorized using a standardized form considering the need for the overtime and the nature of work to be performed (i.e. safety related). Planned overtime up to 10 hours a week (50 hours total) may be authorized at the Department Manager level. Planned overtime in excess of 10 hours a week requires authorization by the Station Director. Except in very unusual circumstances, personnel will not be authorized to exceed 16 hours in a 24 hour period, 24 hours in a 48 hour period or 72 hours in a 7 day period. Otherwise, overtime is restricted to 20 hours per week (60 hours total) and then for no longer than three consecutive weeks.

Attachment (cont'd)

Compliance with the overtime policy is assessed on a weekly basis using gate sheet information. A report is generated from the computerized gate sheet records that identifies individuals who have exceeded one or more of the overtime guidelines. Included in this report are those individuals who have worked greater than 60 hours a week for 3 weeks in a row. The computer report is reviewed against the overtime approval forms to determine if the overtime has been authorized.

The Station Director also receives an overtime report that is based on payroll records. The combination of reports allows for an improved assessment of compliance with the overtime policy. These reports are captured by Pilgrim's Document Control Center to facilitate retrievability and audit.

The station overtime controls, as part of good business practice, specify preauthorization for work in excess of 40 hours and 50 hours per week. Apparent exceptions to these overtime controls are monitored by station management.

Preauthorization is specified for work in excess of 16 hours in a 24-hour period, 24 hours in a 48-hour period and 72 hours in a seven day period to stay within NRC guidelines. Apparent exceptions to these overtime controls are reported to the cognizant manager who is required to investigate, determine the cause for the apparent exception, take remedial action and report results to the Station Director.

A review of records for the period of 4/23/88 to 5/21/88 was conducted to assess the effectiveness of the overtime controls. During that period, approximately 1200 overtime authorizations were issued of which 81% were in the 40 to 50-hour range and 18% in the 50 to 60 hour range. Approximately 1% of the overtime authorizations were to exceed 16 hours in a 24-hour period or 24 hours in a 48-hour period. A review of the overtime reports based on gate sheet records for that period, identified 25 apparent exceptions to the BECo controls established to maintain compliance with NRC guidelines. A review of payroll records for these instances showed 10 exceptions based on actual hours worked. These cases all involved working greater than 24 hours in a 48 hour period. In no cases were the personnel performing safety related activities.

In conclusion, the amount of overtime being worked has decreased significantly since submittal of our October 28, 1987 letter on this subject. The four-week review mentioned above found no instances of overtime being worked in excess of NRC guidelines by personnel performing safety-related work. Therefore, the combination of improved management controls and increased scrutiny of personnel overtime help to ensure that Pilgrim Station meets the intent of the generic letter's guidelines on overtime controls.