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May 6, 1986

BECO 86-056

Mr. John A. Zwolinski, Director
BWR Project Directorate #1
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

License DPR-35
Docket 50-293

Generic Letter 86-04: Policy Statement on
Engineering Expertise on Shift (TMI Item I.A.1.1)

Dear Sir:

By letter of February 13, 1986, the NRC communicated its latest policy statement with respect to ensuring that adequate engineering and accident assessment expertise is possessed by the operating staff of a nuclear power plant. This policy statement provides two options for achieving compliance.

The cover letter under which this policy statement was transmitted requested information concerning the current status and future plans for the Shift Technical Advisor (STA) and dual-role programs. The following is submitted in answer to that request.

Request

What is BECo's current program for providing engineering expertise on shift?

Response

Currently, the requirement for engineering expertise on shift is satisfied at Pilgrim by placing on each shift a dedicated STA who meets the criteria of NUREG-0737, Item I.A.1.1. The STA is involved in shift activities, such as shift turnovers, reviewing logs and maintaining an awareness of plant configuration. In general, BECo employs Option 2, and is in conformance with the staffing requirements of 10 CFR 50.54(m). This is reflected in Section 6 of Pilgrim's Technical Specifications.

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Request

If the current STA program uses an "equivalency" criteria to an engineering degree, describe the criteria?

Response

Under a previously used job description the equivalency is an Associate Degree in Nuclear Engineering and five years operating experience at Pilgrim Station.

The current equivalency is a "Bachelor of Science or equivalent in Engineering". The "equivalency" has been construed as a Bachelor of Engineering Technology or a B.S. in Physical Science.

BECo plans to apply the equivalency criteria of the Policy Statement to new hires for the STA position.

Request

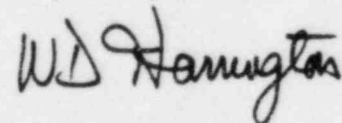
What modifications are proposed to the current program in order to take advantage of the options identified in the Policy Statement?

Response

BECo is now evaluating the advantages of using Option 1, but does not have, at this time, definitive plans to modify its current use of Option 2. However, as allowed by the Policy Statement and Pilgrim Technical Specifications, (Table 6.2-1, note (b)), BECo may alternate between Option 1 and Option 2 on a shift-by-shift basis.

BECo believes this submittal addresses the requests conveyed in the NRC letter of February 13, 1986. Should you wish further information on this issue, please contact us.

Very truly yours,



PMK/kmc

cc: F. Rowsome, Division of Human Factors Technology