

TO: J. PARROTT  
FROM: D.L. HORTON

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AOC-21 TEL: 716 942-4300

NRC HEADQUARTERS

DATE: 09/24/1999  
PAGE: 1

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COPY#	PROC ID	REV#	FC#	DATE	PROCEDURE TITLE
006	PSR-17	4		09/24/1999	MINIMUM STAFFING LEVELS FOR SAFE FACILITY OPERATION

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WVDP-218	8		PREFACE FOR PROCESS SAFETY REQUIREMENTS	ACTIVE	06/12/1998	CHILSON,L.J.
WVDP-218	8	1	PREFACE FOR PROCESS SAFETY REQUIREMENTS	ACTIVE	12/03/1998	CHILSON,L.J.
WVDP-218	8	2	PREFACE FOR PROCESS SAFETY REQUIREMENTS	ACTIVE	03/03/1999	CHILSON,L.J.
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PSR-1	1		REQUIREMENTS FOR LIQUID TRANSFERS OF FISSILE MATERIAL	ACTIVE	03/15/1996	ZUPPINGER,W.L.
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PSR-2	1		MAIN PLANT STACK AIRBORNE EFFLUENT SAMPLING SYTEM REQUIREMENTS	ACTIVE	03/15/1996	ZUPPINGER,W.L.
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PSR-5	1	1	STANDBY AND BACKUP POWER REQUIREMENTS	ACTIVE	01/24/1997	ZUPPINGER,W.L.
PSR-5	1	2	STANDBY AND BACKUP POWER REQUIREMENTS	ACTIVE	05/02/1997	ZUPPINGER,W.L.
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PSR-5	1		STANDBY AND BACKUP POWER REQUIREMENTS	ACTIVE	03/15/1996	ZUPPINGER,W.L.
PSR-6	1	1	FISSILE MATERIAL PACKAGING AND STORAGE REQUIREMENTS	ACTIVE	04/07/1997	TARANTELLLO,F.A.
PSR-6	1	2	FISSILE MATERIAL PACKAGING AND STORAGE REQUIREMENTS	ACTIVE	07/02/1998	TARANTELLLO,F.A.
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PSR-7	1		EVACUATION ALARM, EMERGENCY PAGING SYSTEM, AND SHELTERING ALARM REQUIREMENTS	ACTIVE	03/15/1996	ELLIOTT,D.I.
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PSR-10	2		HIGH-LEVEL WASTE TANK LEAK DETECTION SYSTEM REQUIREMENTS	ACTIVE	05/08/1996	MEESS,D.C.
PSR-11	1		HIGH-LEVEL WASTE TANK SPARE CAPACITY REQUIREMENTS	ACTIVE	03/15/1996	MEESS,D.C.
PSR-11	1	1	HIGH-LEVEL WASTE TANK SPARE CAPACITY REQUIREMENTS	ACTIVE	03/26/1997	MEESS,D.C.
PSR-12	3		VITRIFICATION FACILITY VENTILATION AND OFF-GAS SYSTEMS REQUIREMENTS	ACTIVE	02/21/1997	KOCIALSKI,T.F.
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PSR-12	3	2	VITRIFICATION FACILITY VENTILATION AND OFF-GAS SYSTEMS REQUIREMENTS	ACTIVE	03/03/1999	KOCIALSKI,T.F.
PSR-12	3	3	VITRIFICATION FACILITY VENTILATION AND OFF-GAS SYSTEMS REQUIREMENTS	ACTIVE	05/20/1999	KOCIALSKI,T.F.

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PSR-13	2		VITRIFICATION FACILITY STANDBY POWER REQUIREMENTS	ACTIVE	03/28/1996	KOCIALSKI,T.F.
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PSR-9	1		TN-BRP AND TN-REG SHIPPING CASK LID INSTALLATION	CANCELLED	03/15/1996	CHILSON,L.J.
PSR-14	1		VITRIFICATION FACILITY CONFINEMENT BARRIER REQUIREMENTS	CANCELLED	03/15/1996	CHILSON,L.J.

WVNS CONTROLLED DOCUMENT SYNOPSIS FORM

Date: 05/04/99

Page 1 of 1

Document ID Number: PSR-17 Revision: 4

Field/Page Change (if applicable): N/A

Document Title: PSR - Minimum Staffing Levels for Safe Facility Operations

Cognizant Author: R. J. Fussner Ext. 4048  
(Printed Name)

Describe the following information below:

(1) Where the change appears in the procedure. (2) What was changed. (3) Why the change was made. (4) What organizations/personnel [by title] are affected by change.

Staffing levels have been modified based on the current life cycle stage of the  
Vitrification and IRTS Facilities. Since these systems now run intermittently  
versus full time, some allowances for combination of qualifications, on-call engineer  
coverage, and reduction of overall manning requirements have been made.

Specifically, this revision will give qualified Vit Supervisors authority to watch over  
the former IRTS Facilities, as long as two or less Vit/IRTS systems are operating.  
Similarly, when two or less Vit/IRTS Facilities are operating, the requirement for the  
Vit Shift Engineer can be covered on an on-call basis (IRTS Shift Engineer has been on  
an on-call basis since prior to the inception of PSR-17). When more than two of the  
Vit/IRTS Facilities are operating, a second qualified supervisor is required and the  
shift engineer must be available on-site.

The STS and SMS Facilities have been separated into different functions to better  
reflect current operating modes. The high-level waste transfer operations are now  
specifically defined under SMS.

The requirement for a Vit "B" Operator has been eliminated due to the reduction in the  
facilities processing time. Additional manpower, above the system qualified operators,  
is not required to complete current work.

FOR INFORMATION ONLY

# West Valley Demonstration Project

Doc. ID Number PSR-17

Revision Number 4

Revision Date 09/24/99

## PROCESS SAFETY REQUIREMENT

### MINIMUM STAFFING LEVELS FOR SAFE FACILITY OPERATION

APPROVED BY	<u><i>R Keel</i></u>	<u>5/18/99</u>
	Manager Operations Support	Date
APPROVED BY	<u><i>[Signature]</i></u>	<u>5/18/99</u>
	Manager Site Operations and Facility Closure Projects	Date
APPROVED BY	<u><i>G J Valenti</i></u>	<u>5-19-99</u>
	Manager HLW Projects	Date
APPROVED BY	<u><i>[Signature]</i></u>	<u>5/19/99</u>
	Radiation & Safety Committee, Chairman	Date
AUTHORIZATION TO IMPLEMENT	<u><i>[Signature]</i></u>	<u>9/23/99</u>
	Manager Site Operations and Facility Closure Projects	Date
AUTHORIZATION TO IMPLEMENT	<u><i>G J Valenti</i></u>	<u>9-23-99</u>
	Manager HLW Projects	Date



West Valley Nuclear Services Co., Inc.

10282 Rock Springs Road

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WVNS RECORD OF REVISION

DOCUMENT

If there are changes to the controlled document, the revision number increases by one. Indicate changes by one of the following:

- Placing a vertical black line in the margin adjacent to sentence or paragraph that was revised.
- Placing the words GENERAL REVISION at the beginning of the text.
- Placing either FC#> or PC#> (whichever applies) in the left-hand margin at the beginning of the paragraph or section where the field/page change has been made AND placing a vertical black line in the margin adjacent to the actual change.
- Placing the words "New-Type Revision" or "On-Hold" in the description of changes.

Example:

The vertical line in the margin indicates a change. |

**FC1>** The FC#> in the margin along with the vertical line (redline) indicates a change. |

<u>Rev. No.</u>	<u>Description of Changes</u>	<u>Revision On Page(s)</u>	<u>Dated</u>
0	Original Issue DOE approval contained in Letter DW:96:0062, dated 01/26/96	All	03/15/96
1	Provided more details in Basis Section	3-6	08/05/96
	Revised STS/SMS and LWTS definition of OPERATING	7	
	Revised minimum VF staffing level when STS/SMS is OPERATING	8	
	DOE-WV approval contained in Letter DW:96:0543, dated 07/03/96		

WVNS RECORD OF REVISION CONTINUATION FORM

Rev. No.	Description of Changes	Revision On Page(s)	Dated
2	Added provision prohibiting one individual from performing more than one PSR-17-related function at a time	2	04/22/97
	Added ACTION for Operations Shift Supervisors when Main Plant falls below its minimum staffing levels.	3	
	Revised Basis Section and Table 2 to address the provision prohibiting one individual from performing more than one PSR-17-related function at a time; to permit a HLW-Transfer-System-Operator-"A"-qualified operator in STS/SMS and/or LWTS to serve as the VF's HLW Transfer System Operator "A"; and to revise the minimum VF staffing level for VF Plant Operator "B" from "2" to "1".	4-5, 8-9	
	DOE-WV approval contained in Letter DW:97:0297, dated 04/07/97		
3	Major Change Revision		11/03/98
	Changed "Operations Shift Supervisor" to "Operations Supervisor"	2	
	Added information on and citations for FRS SAR, WVNS-SAR-012	3, 4, 6	
	Changed "IRTS Supervisor" to "Supervisor"; permit VF Operations Shift Supervisor to serve as Supervisor for LWTS; clarified wording regarding a HLW Transfer System Operator "A" serving as an Operator "A" for STS/SMS or LWTS (but not both)	4-5, 8-9	
	Added clarification that VF Control Room Operator shall hold both VF In-Cell Operator and VF Ex-Cell Operator qualifications	8-9	
	Removed references to Senior Operations Specialists	4-6, 8-9	
	OH/WVDP approval contained in Letter DW:1998:1403, dated 10/26/98		

WVNS RECORD OF REVISION CONTINUATION FORM

<u>Rev. No.</u>	<u>Description of Changes</u>	<u>Revision On Page(s)</u>	<u>Dated</u>
4	Major Change Revision Deleted requirement for Vit "B" operator Separated STS/SMS into two distinct operations Expanded flexibility of VOSS position consistent with new qualifications Modified Vit Shift Engineer requirement to allow some coverage via an on-call basis Reformatted Table 1 and 2 for clarity, incorporating subscript notes OH/WVDP approval contained in Letter DW:1999:0556, dated 08/05/99	All	09/24/99



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PROCESS SAFETY REQUIREMENT - 17

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TITLE: Minimum Staffing Levels for Safe Facility Operation

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CRITERIA: Ensure minimum staffing levels for safe operation of Hazard Category 2 and 3 facilities. (PSR Criterion 3.i.)

UNACCEPTABLE EVENTS: Inadequate staffing levels for safe operation of Hazard Category 2 and 3 facilities.

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Process Safety Requirement - 17

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PROCESS SAFETY REQUIREMENT  
MINIMUM STAFFING LEVELS FOR SAFE FACILITY OPERATION

APPLICABILITY

This Process Safety Requirement (PSR) applies to Hazard Category 2 or 3 facilities that are OPERATING.

OBJECTIVE

The objective of this requirement is to ensure that minimum staffing is available for safe operation of Hazard Category 2 or 3 facilities.

SPECIFICATION

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1. LIMITING CONDITION FOR OPERATION

A facility shall not begin OPERATING (as defined in Table 1) until the minimum staffing level of Table 2 for that facility is met. When a facility is OPERATING (as defined in Table 1), the minimum staffing level of Table 2 for that facility shall be maintained.

Unless explicitly permitted otherwise in PSR-17, an individual who is performing a specific PSR-17-related function (a "column" in Table 2) for one facility (a "row" of Table 2) shall NOT perform another PSR-17-related function for any facility at the same time.

ACTION

If the staffing level for an OPERATING facility falls below the minimum presented in Table 2 for any position, IMMEDIATE and continuing efforts shall be made to restore staffing to at least the minimum indicated in Table 2. If the staffing level cannot be restored within 2 hours to at least the minimum presented in Table 2, that facility shall cease OPERATING within 8 additional hours.

If the staffing level for the Main Plant falls below the minimum presented in Table 2 for any position, the Main Plant Operations Shift Supervisor (or designee) shall IMMEDIATELY notify the Operations Supervisors (or designees) responsible for all other facilities presented in Table 2 that are OPERATING (as defined in Table 1). Those Operations Supervisors (or designees) shall treat such notification as though their own facilities' staffing levels had fallen below the minimum presented in Table 2 and IMMEDIATELY take the ACTION specified in the preceding paragraph.

#### SURVEILLANCE REQUIREMENT

The staffing level (for each position whose minimum staffing level presented in Table 2 is greater than zero) shall be confirmed and documented in the supervisor log or equivalent at the beginning of each SHIFT for each facility by the Supervisor (or designee) responsible for each individual facility identified in Table 2.

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#### BASIS

##### General

The minimum staffing levels are established to ensure that essential operational and support functions are available for Hazard Category 2 or 3 facilities that are OPERATING (as defined in Table 1). The personnel indicated in Table 2 shall be on-site at the West Valley Demonstration Project, or on-call when so specified, and performing those activities associated with (or supporting) their professional responsibilities.

The Supervisor (or designee) responsible for each individual OPERATING facility identified in Table 2 is the person responsible for meeting and maintaining the minimum staffing level for his facility (and documenting that fact), even though a particular job position identified in Table 2 does not organizationally report to that supervisor. For example, the Main Plant Operations Shift Supervisor is responsible for ensuring that the minimum staffing requirement for Radiological Control Technicians is met and maintained, even though those technicians are not in the Main Plant Operations organization.

The minimum staffing levels to ensure safe operations for Hazard Category 2 and 3 nuclear facilities are defined in the West Valley Demonstration Project (WVDP) Safety Analysis Reports (SARs). The Safety Analysis Report for Low-Level Waste Processing and Support Activities (WVNS-SAR-002), the Safety Analysis Report for Vitrification Operations and High-Level Waste Interim Storage (WVNS-SAR-003), and the Safety Analysis Report for Fuel Receiving and Storage Facility (WVNS-SAR-012) do not require operator actions to prevent or mitigate the consequences of accidents to meet the evaluation guidelines. Therefore, the minimum staffing level to ensure safe operations is zero.

As a best management practice, West Valley Nuclear Services Co., Inc. (WVNS) has established minimum staffing levels to ensure that essential operational and support functions are available for Hazard Category 2 and 3 nuclear facilities. It is WVNS's intent to provide sufficient personnel to operate the processes, perform surveillances of the processes, and respond to off-normal conditions, should they occur. A brief rationale for the minimum staffing levels established herein is provided below.

#### Main Plant

The Main Plant has no OPERATING functions that require staff. This includes the transfer of waste within the Main Plant (e.g., transfers to or from Tanks 7D-14, 7D-2, 3D-2, and 13D-8). However, minimum staffing requirements shall be met when transferring materials to processing facilities, as identified in Tables 1 and 2.

The Main Plant personnel identified in Table 2 provide support functions for the other WVDP facilities. Two Main Plant Operator "A" personnel are required to support ventilation system operations and stand-by power distribution. One Main Plant Operations Shift Supervisor is required to serve as the Incident Commander per WVDP-022, WVDP Emergency Plan, and to coordinate support functions for the other WVDP facilities. One Radiological Control Technician "A" is required to support the radiological controls program requirements at the WVDP. This Radiological Control Technician "A" is not required full-time or continuously at any one WVDP facility.

STS

When OPERATING, the Supernatant Treatment System (STS) requires one Supervisor and two "A" Operators to effectively support transfer of high-level waste through the ion-exchange columns or between Tanks 8D-1 and 8D-2. A shift engineer shall be on-shift or assigned on-call through a formal schedule and paging system.

SMS

When OPERATING, the Sludge Mobilization System (SMS) requires one Supervisor and two "A" Operators to effectively support transfer of High-Level Waste between tanks connected by the High-Level Waste Transfer System. A shift engineer shall be on-shift or assigned on-call through a formal schedule and paging system.

VF

When OPERATING, the Vitrification Facility (VF) requires one Supervisor and one Control Room Operator (qualified in both In-cell and Ex-cell areas), one In-cell Operator, and one Ex-cell Operator to effectively transfer and process high-level waste into and within the CFMT, MFHT, and melter. An SMS Operator is required to monitor and respond to the effects of vitrification operations on the Waste Tank Farm components. A shift engineer shall be on-shift or assigned on-call through a formal schedule and paging system.

FRS

The Fuel Receiving and Storage (FRS) facility requires one Fuel Handler when fuel movement is on-going within the facility. The Main Plant provides the Radiological Control Technician "A" and Main Plant Operator "A" personnel, as required.

LWTS

When OPERATING, the Liquid Waste Treatment System (LWTS) requires one Supervisor and two "A" Operators to effectively support processing of waste through the LWTS evaporator. A shift engineer shall be on-shift or assigned on-call through a formal schedule and paging system.

STS/SMS/LWTS/VE

When combinations of the above systems are OPERATING, qualified personnel are required as follows:

Any two systems OPERATING, one qualified Supervisor and one on-call Shift Engineer are required. The total number of operators required is the cumulative number required for each system.

Any three or more systems OPERATING, two qualified Supervisors and one Shift Engineer are required. The total number of operators required is the cumulative number required for each system.

CPC-WSA

The Chemical Process Cell - Waste Storage Area (CPC-WSA) requires one Waste Management Supervisor and one Waste Management Operator to move waste into, out of, or within the CPC-WSA. The Main Plant provides the Radiological Control Technician "A" and Main Plant Operator "A" personnel, as required.

NDA

Although the NRC-Licensed Disposal Area (NDA) is a Hazard Category 2 facility, there are no facility OPERATING functions that require minimum staffing.

ATTACHMENTS

Table 1 - Facility Identifications and OPERATING Functions

Table 2 - Minimum Staffing Levels For Safe Facility Operation

REFERENCES

WVNS-SAR-002, Safety Analysis Report for Low-Level Waste Processing and Support Activities, Latest Revision.

WVNS-SAR-003, Safety Analysis Report for Vitrification Operations and High-Level Waste Interim Storage, Latest Revision.

WVNS-SAR-012, Safety Analysis Report for Fuel Receiving and Storage Facility,  
Latest Revision.

WVDP-022, WVDP Emergency Plan, Latest Revision.

Table 1  
 Facility Identifications and OPERATING Functions

Facility Name (as used in Table 2)	Facility Identification	OPERATING Functions that Require Minimum Staffing
Main Plant	Main Plant (includes Analytical and Process Chemistry Lab)	None. Minimum staffing levels for Main Plant apply when any or all of the other Hazard Category 2 or 3 facilities are OPERATING.
STS	Supernatant Treatment System including STS and Permanent Ventilation System	Operations including <u>any</u> of the following: <ul style="list-style-type: none"> <li>• transferring HLW between Tanks 8D-1 and 8D-2 using Pumps 50-G-001 and/or 50-G-004, <u>or</u></li> <li>• processing HLW through the ion-exchange columns.</li> </ul>
SMS	Sludge Mobilization System including High-level Waste Transfer System, Mobilization Pumps, and Waste Tank Farm	Operations including <u>any</u> of the following: <ul style="list-style-type: none"> <li>• transferring HLW between Tanks 8D-1, 8D-2, and 8D-4 using Pumps 55-G-012, 55-G-013, and/or 55-G-014, <u>or</u></li> <li>• transferring HLW to or from the VF's Concentrator Feed Make-up Tank (CFMT).</li> </ul>
VF	Vitrification Facility (includes VF Cell, Waste Canister Transfer Tunnel, High-Level Waste Interim Storage, Off-Gas Trench, High-Level Waste Transfer Trench, and Vit Support Systems from Main Plant)	Operations that include <u>any</u> of the following activities: <ul style="list-style-type: none"> <li>• transferring high-level waste from the Waste Tank Farm (WTF) to the CFMT; <u>or</u></li> <li>• concentrating high-level waste in the CFMT; <u>or</u></li> <li>• transferring high-level waste from the CFMT to the Melter Feed Hold Tank (MFHT); <u>or</u></li> <li>• transferring high-level waste from the MFHT to the Slurry-Fed Ceramic Melter (SFCM).</li> </ul>
FRS	Fuel Receiving and Storage	Moving fuel assemblies.
LWTS	Liquid Waste Treatment System	Processing waste through the evaporator.
CPC-WSA	Chemical Process Cell - Waste Storage Area	Transferring radioactive waste into, out of, or within the facility.



Table 2  
 Minimum Staffing Levels for Safe Facility Operation

Operating Status	Shift Engineer	Supervisor	VPCR	In-Cell	Ex-Cell	STS	SMS*	LWTS	Fuel Handler	WMO Operator
VF	On Call	1	1	1	1	0	1	0	0	0
STS	On Call	1	0	0	0	2	0	0	0	0
SMS	On Call	1	0	0	0	0	2	0	0	0
LWTS	On Call	1	0	0	0	0	0	2	0	0
VF/STS	On Call	1	1	1	1	2	1	0	0	0
VF/SMS	On Call	1	1	1	1	0	2	0	0	0
VF/LWTS	On Call	1	1	1	1	0	1	2	0	0
STS/SMS	On Call	1	0	0	0	2	2	0	0	0
STS/LWTS	On Call	1	0	0	0	2	0	2	0	0
SMS/LWTS	On Call	1	0	0	0	0	2	2	0	0
VF/STS/LWTS	1	2	1	1	1	2	1	2	0	0
VF/SMS/LWTS	1	2	1	1	1	0	2	2	0	0
VF/STS/SMS	1	2	1	1	1	2	2	0	0	0
STS/SMS/LWTS	1	2	0	0	0	2	2	2	0	0
VF/SMS/STS/LWTS	1	2	1	1	1	2	2	2	0	0
FRS	0	0	0	0	0	0	0	0	1	0
CPC-WSA	0	1	0	0	0	0	0	0	0	1

\* The operator staffing the SMS position for the Vitrification Facility may concurrently hold one of the STS or LWTS positions.

**MAIN PLANT:** One qualified Main Plant Supervisor (or designee), two qualified Main Plant "A" Operators, and one Radiological Control "A" Technician are required for any operation noted above.