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June 20, 2000

Re: Indian Point Unit No. 2
Docket No. 50-247

Mr. Richard Conte, Chief
Human Performance & Emergency
Preparedness Branch
Division of Reactor Safety - Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1498

SUBJECT: Waiver Request – Six Months on Site Time

Dear Mr. Conte:

Consolidated Edison Company of New York, Inc. requests that the individuals on the attachments be granted a waiver of the sequencing of the six months on site time as noted in NUREG-1021 Rev. 8, Operator Licensing Examination Standards for Power Reactors, Section ES-202, Preparing And Reviewing Operator Licensing Applications. The request is to allow these individuals to complete the Senior Reactor Operator Training Program, including the NRC license examination, followed by the six months on site time. Assuming successful completion of the NRC license examination, license issuance would follow completion of the six months on site time.

We are requesting this waiver on sequencing because the individuals were recently hired and did not have the ability to complete the noted six months on site before the Senior Reactor Operator Program commenced. These individuals will complement Con Edison's plan to increase the number of Senior Reactor Operators in anticipation of attrition, to support an infusion of new ideas by bringing in quality individuals with industry experience, and to allow Senior Reactor Operator licensed individuals to move to other departments within the site. These initiatives are focused on improving operator and station performance.

In addition, Con Edison requests that the qualification review letters dated January 28, 2000 and March 6, 2000 for these individuals not be considered at this time, in as much as


additional reviews indicate that these individuals satisfy the substitute experience requirements of Appendix F of NUREG-1021 Rev. 8.

Additionally, Con Edison has verified that its Senior Reactor Operator Training Program Description, Technical Specifications, Quality Assurance Program Description, and Updated Final Safety Analysis Report all reference ANSI N18.1-1971.

Please note that the attachments contain proprietary information. Thus, in accordance with 10CFR2.790(a)(6) we understand that the attachments will not be placed in the Public Document room and will receive limited distribution.

Should you have any questions regarding this matter, please contact Mr. Frank Kich, Manager, Operator Training.

Sincerely,



Attachment

cc: Mr. Hubert J. Miller
Regional Administrator
US Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406

Mr. Robert Gallo, Chief
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Document Control Desk
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Mr. Patrick D. Milano, Project Manager
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Senior Resident Inspector
US Nuclear Regulatory Commission
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