

Northeast
Utilities System

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Northeast Utilities Service Company
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August 24, 1995

Docket No. 50-423
B15333

Re: 10CFR55

Mr. Thomas T. Martin
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Millstone Nuclear Power Station, Unit No. 3
Operator License Qualification Waiver Request

The purpose of this letter is to notify the NRC Staff of Northeast Nuclear Energy Company's (NNECO) intent to request a waiver of the experience provisions of NUREG 1021, ES202, Section E.2 for Mr. Scott K. Walsh. Mr. Walsh is currently enrolled in the Millstone Unit No. 3 Licensed Operator Initial Training (LOIT) Program for the purpose of obtaining a Senior Operator License at Millstone Unit No. 3. Mr. Walsh is currently a member of the Millstone Unit No. 3 operator training staff.

The NUREG 1021 experience provisions for which waivers will be requested are the minimum of four years of responsible power plant experience described in E.2.a(1), and the minimum of one year of experience performing licensed duties described in Section E.2.a(2). Mr. Walsh's experience, although extensive, does not include experience which is typically considered "responsible power plant experience" for the purposes of meeting the eligibility provisions. We believe, however, that his experience has prepared him well to both satisfactorily complete the LOIT Program and to carry out the responsibilities of a Senior Operator License.

Mr. Walsh has over 14 years of experience at Millstone Unit No. 3 as an instrument and controls specialist, supervisor (foreman), and trainer. The following provides additional details of this experience:

- During Millstone Unit No. 3 startup testing, Mr. Walsh advised the licensed operators of the technical aspects and operations of various instrument systems including solid state protection and emergency diesel generator sequencing systems.
- He has become an expert on the Millstone Unit No. 3 rod control system.

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- He has provided instruction to Millstone Unit No. 3 licensed operators and license candidates on various instrument and control systems.
- He has provided technical assistance to line organizations on many occasions.
- He is knowledgeable of the integration of instrument and control systems with plant operations and of plant and work control administrative requirements. This is evidenced by his work with licensed operators in the Millstone Unit No. 3 control room.

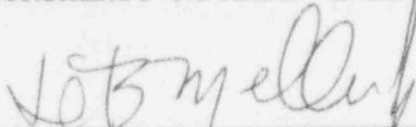
Regarding Mr. Walsh's education, he has an Associate of Science Degree in electrical engineering, and approximately 40 additional credits toward a Bachelor of Science degree. We believe that Mr. Walsh's experience, coupled with his more than three years of post high school education, meets the intent of the responsible power plant experience provisions contained within NUREG 1021.

Regarding the provision within NUREG 1021 that a candidate have one year experience performing licensed duties at the facility for which the senior operator license is sought, this provision applies to senior operator license candidates not having a four year degree in engineering, or the equivalent. Although Mr. Walsh has yet to receive his Bachelor of Science degree, Mr. Walsh expects to complete this by December 1996. We believe Mr. Walsh's progress toward completion of his Bachelor of Science degree justifies consideration for waiver of this provision.

NNECO is providing this information at the request of NRC Region I Staff, so that a preliminary evaluation of the appropriateness of the forthcoming waiver request can be conducted. Should you have additional questions regarding this, please contact Mr. Jeffrey F. Smith, Manager, Operator Training, at (203) 437-2573.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



D. B. Miller, Jr.
Senior Vice President

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cc: G. W. Meyer, Chief, BWR and PWR Section, DRS, Region I
P. D. Swetland, Senior Resident Inspector, Millstone Unit
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