

EDO Principal Correspondence Control

FROM: DUE: 11/02/05 EDO CONTROL: G20050698  
DOC DT: 10/07/05  
FINAL REPLY:

Senator Christopher J. Dodd

TO:

Rathbun, OCA

FOR SIGNATURE OF : \*\* GRN \*\* CRC NO: 05-0499

Reyes, EDO

DESC:

ROUTING:

Licensing Employees Who Perform HVAC Work at the  
Millstone Nuclear Power Plant (Robert Vivari, Jr.)

Reyes  
Virgilio  
Kane  
Silber  
Dean  
Cyr/Burns  
Collins, RI  
Schmidt, OCA

DATE: 10/13/05

ASSIGNED TO: CONTACT:

NRR

Dyer

SPECIAL INSTRUCTIONS OR REMARKS:

Prepare response to Senator Dodd for the signature  
of L. Reyes, EDO.

Template: SECY-017

E-RIDS: SECY-01

OFFICE OF THE SECRETARY  
CORRESPONDENCE CONTROL TICKET

*Date Printed: Oct 12, 2005 14:28*

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**PAPER NUMBER:** LTR-05-0499 **LOGGING DATE:** 10/11/2005  
**ACTION OFFICE:** EDO

**AUTHOR:** SEN Christopher Dodd  
**AFFILIATION:** CONG  
**ADDRESSEE:** Dennis Rathbun  
**SUBJECT:** Licensing employees who perform HVAC work at the Millstone nuclear power plant

**ACTION:** Signature of EDO  
**DISTRIBUTION:** OCA to Ack

**LETTER DATE:** 10/07/2005  
**ACKNOWLEDGED:** No  
**SPECIAL HANDLING:**

**NOTES:**  
**FILE LOCATION:** ADAMS

**DATE DUE:** 11/02/2005 **DATE SIGNED:**

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EDO --G20050698

OCT. 11. 2005 12:42PM

SENATOR DODD

NO. 670

P. 2

CHRISTOPHER J. DODD  
CONNECTICUT

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United States Senate

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HOME PAGE: <http://dodd.senate.gov>

October 7, 2005

Mr. Dennis K. Rathburn  
Director, Office of Congressional Affairs  
Nuclear Regulatory Commission  
Washington, DC 20555  
VIA FACSIMILE (301) 415-8571

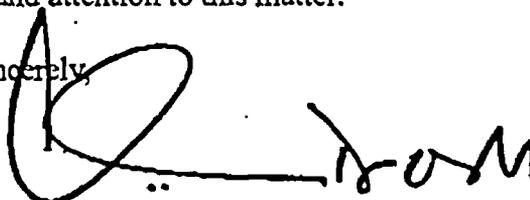
Dear Mr. Rathburn:

I am writing on the behalf of my constituent, Mr. Robert Vivari, Jr., who is concerned with the licensing of employees who perform HVAC work at the Millstone Nuclear Power Station in Waterford, Connecticut.

I would appreciate your review of Mr. Vivari's concerns, so that I may respond to him.

Thank you for your cooperation and attention to this matter.

Sincerely,



CHRISTOPHER J. DODD  
United States Senator

Enclosures

CC: State Representative Christopher G. Donovan, Majority Leader  
In reply: Connecticut Office  
Attn.: Ryan C. Drajewicz

THE CONNECTICUT GENERAL ASSEMBLY  
HOUSE OF REPRESENTATIVES



CHRISTOPHER G. DONOVAN  
MAJORITY LEADER

Senator Christopher Dodd  
Putnam Park  
100 Great Meadow Road  
Wethersfield, Connecticut 06109

September 26, 2005

Dear Senator Dodd,

I received the attached e-mail from a constituent, Mr. Robert Vivari, Jr., who is concerned with the licensing of employees who perform HVAC work at the Millstone Nuclear Power Station in Waterford.

Since the Nuclear Regulatory Commission is a federal agency and outside of my jurisdiction as a State Representative, I am asking you to please assist Mr. Vivari. If you have any questions, please do not hesitate to contact my office and speak to Amy.

Sincerely,

Christopher G. Donovan

cc: Robert Vivari, Jr.

From: Rob V. [rvjr1@msn.com]  
Sent: Friday, September 09, 2005 9:25 AM  
To: Rep. Donovan, Christopher  
Subject: Licensing issue @ Millstone Nuclear Power Station

Dear Representative Donovan,

I'm writing to you for some guidance in reference to a licensing issue that has existed at the Millstone Nuclear Power Station in Waterford for quite some time. The reason I chose to contact you concerning this issue is because I've been nearly a lifelong resident of Meriden, I know you've always been an advocate of labor, and are now in a leadership position.

I'm a licensed(SM-2) Sheet Metal Worker who has worked at Millstone for a good portion of the last 6 1/2 years. HVAC work done in the State of CT has required a license since we became a licensed trade about 3 or 4 years ago. At that time, I had asked my superiors if that meant the in-house maintenance personnel needed to be licensed to work on ventilation systems in the plant, and I was told that they didn't need to hold a license because it wasn't required Federally (NRC?). At that time, I had thought it was ridiculous that you were required to have a license to install an AC system in a house, but a maintenance person who had no knowledge, experience, or training could work on ventilation systems that could ultimately impact the environment if components were worked on or installed improperly. My thoughts regarding that haven't changed. If anything, the standards and requirements should be HIGHER at a Nuclear Power Station! Other trades that require a license in CT are electricians and pipefitters, but again they don't need to be licensed at Millstone from the information I received.

Dominion, the company who purchased Millstone from Northeast Utilities when they were required to sell it, has pushed to cut personnel and expenditures since they bought it, which seems to be the norm in business today. With NU, the construction trades who were on site year-round, or were brought in to do maintenance during refuel and other outages, worked under a General President's Maintenance Agreement. After the plant was sold, Dominion never signed this agreement, but verbally agreed to adhere to it. One of the conditions of that agreement was that work in the Power Block would be done by Union or In-House labor. What's happening there now is non-union companies are starting to do work there, and as it exists now, don't need to be licensed to do work on the site. Also, Dominion is having their maintenance people do increasingly more of the work that used to be done by specialized contractors. What this means is that more work is done on equipment and systems by unlicensed and possibly unqualified personnel. I don't think that's something you want to see happening at a plant where someone's mistake or lack of qualifications could impact the environment or persons in the surrounding area.

My motivation is to try and contact some individuals in CT State government such as yourself who could pursue the licensing issue as it applies to Millstone. I think common sense would indicate that the requirements for work done at a nuclear power plant should be at the very LEAST equal to a home or building elsewhere in the state! I don't know all the legalities about dealing with the Federal government, or the Nuclear Regulatory Commission, so that's why my letter is directed at you. It's entirely possible no one ever saw the need to pursue this issue, but I certainly do and would think anyone made aware of it would also. So, is this something you could pursue, or direct me to a person in State government who could? I'd appreciate any guidance you could give me. I know anything to do with labor is a hard sell in government, but this is less of a labor issue and more of a safety issue. Applying existing CT State licensing requirements to the most potentially hazardous site in the state if an accident occurred doesn't seem to be too much to ask.

Sincerely,  
Robert Vivari Jr.