



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

Withhold Enclosures 3 & 4 from Public Disclosure in Accordance with  
10 CFR 2.390 – Attachment Contains Personally Identifiable Information

March 8, 2018  
NOC-AE-18003554  
10 CFR 55.11  
10 CFR 55.47  
10 CFR 55.31  
File No. D4302

Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

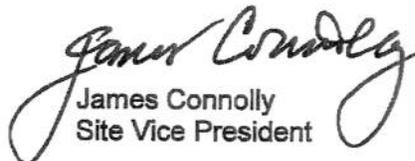
South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498; STN 50-499  
Request for Waiver of Exam and Testing Requirements and  
Request for Exemption from 10 CFR 55.47 Waiver of Examination and Test Requirements

In accordance with 10 CFR 55.47, STP Nuclear Operating Company (STPNOC) requests a waiver of the written examination and operating test requirements for a Reactor Operator. Additionally, in accordance with 10 CFR 55.11, STPNOC requests an exemption from the requirements of 10 CFR 55.47 (a)(1), Waiver of Examination and Test Requirements, for a license applicant who did not meet the two year eligibility requirement for the waiver.

Pursuant to the provisions in 10 CFR 55.31 and NUREG 1021, Operator Licensing Examination Standards for Power Reactors, Revision 11, STPNOC is submitting the reactor operator license application for the individual identified in the Enclosures. Enclosure 1 documents the requested exemption and the basis for the exemption. Enclosure 2 documents the requested waiver and the basis for the waiver. Enclosures 3 and 4 provide the NRC Form 398, "Personal Qualification Statement - Licensee," and the NRC Form 396, "Certification of Medical Examination by Facility Licensee," for the applicant. STPNOC requests that the information provided in Enclosures 3 and 4 be withheld from public disclosure pursuant to 10 CFR 2.390 (a)(6).

There are no commitments in this letter.

If you have any questions concerning this letter, contact David Breland at 361-972-7617 or Henry Curry at 361-972-7327.

  
James Connolly  
Site Vice President

- Enclosures:
1. Request for Exemption from 10 CFR 55.47 Waiver of Examination and Test Requirements in accordance with 10 CFR 55.11
  2. Request for Waiver from Examination and Test Requirements in accordance with 10 CFR 55.47 (a)(1)
  3. NRC Form 398 - Personal Qualification Statement – Licensee
  4. NRC Form 396 - Certification of Medical Examination by Facility Licensee

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STI: 34604982

(paper copy w/o Enclosure 3 and 4)

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\* Copies distributed without Enclosures 3 and 4 except as noted by the asterisk

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NOC-AE-18003554  
Enclosure 1

## ENCLOSURE 1

Request for Exemption from 10 CFR 55.47 Waiver of Examination and  
Test Requirements in accordance with 10 CFR 55.11

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### **Requested Exemption**

In accordance with 10 CFR 55.11, STP Nuclear Operating Company (STPNOC) requests an exemption from the requirements of 10 CFR 55.47, Waiver of Examination and Test Requirements, for a license applicant (Reactor Operator) who did not meet the two year eligibility requirement. 10 CFR 55.47 states in part, "(a) on application, the Commission may waive any or all of the requirements for a written examination and operating test, if it finds that the applicant... (1) has had extensive actual operating experience at a comparable facility...within two years before the date of application".

### **Basis for the Requested Exemption**

The criteria for granting specific exemption from 10 CFR 55 regulations are stated in 10 CFR 55.11. In accordance with 10 CFR 55.11, the NRC is authorized to grant an exemption upon determining that the exemption is authorized by law and will not endanger life or property and is otherwise in the public interest. The information provided below supports these criteria.

Mr. Michael D. Denton received his STP Reactor Operator license in October 2011, and worked as a reactor operator until August 5, 2015, when he last manipulated the plant as a reactor operator (greater than two years). He was up-to-date in the requalification program at the time of his license termination and performed competently up until his departure from STP. Mr. Denton terminated his employment with STPNOC on August 6, 2015 and subsequently worked in the Operations Support group at V.C Summer Units 3 and 4 where he did not participate in any licensed operator classes during that period.

Mr. Denton returned to employment with STPNOC on August 21, 2017 in Operations Support. Mr. Denton completed an additional training process of self-study and one-on-one instruction where he was exposed to the license operator requalification material, including Generic Fundamentals of Engineering (GFE) since his departure. He successfully passed all written examinations for each requalification cycle as well as the biennial licensed operator requalification written examinations for 2015 and 2017 on January 30, 2018, and February 8, 2018, respectively. Subsequently, on March 6, 2018 he passed a GFE exam. Mr. Denton also completed and passed an operational exam consisting of two simulator operating tests and a Job Performance Measure (JPM) exam consisting of five JPM walkthrough tests administered on February 20, 2018.

Mr. Denton has spent a total of 120 hours on shift performing the following: 1) 60 hours of shift functions under the instruction of a licensed operator in the position of reactor operator including review of all required shift turnover procedures; 2) 60 hours as a non-licensed operator (NLO) standing watch at each NLO watch station under the direction of a qualified on duty NLO. He performed plant walk downs for re-familiarization and to familiarize himself with any changes implemented since departing STP.

STPNOC is requesting this exemption to increase staffing of licensed reactor operators due to increased attrition over the past several years. This exemption will ease licensed operator overtime and provide watch rotation flexibility. STPNOC has increased the number of students in licensed reactor operator training classes and is running concurrent training classes to fill the gap in licensed operator staffing going forward. Without the exemption, Mr. Denton will have to wait approximately one and a half years to take the NRC administered licensed operator examination in July 2019.

Based on the information provided above, this exemption from the waiver requirements of 10 CFR 55.47(a)(1) will not endanger life or property and is otherwise in the public interest.

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NOC-AE-18003554  
Enclosure 2

## ENCLOSURE 2

Request for Waiver from Examination and Test Requirements in  
accordance with 10 CFR 55.47 (a)(1)

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**Requested Waiver:**

In accordance with 10 CFR 55.47, STP Nuclear Operating Company (STPNOC) requests a waiver of the NRC administered written examination and operating test requirements for a reactor operator as described in 10 CFR 55.47 and NUREG 1021, ES-204.

**Basis for the Requested**

The criteria for granting a waiver from 10 CFR 55 regulations are stated in 10 CFR 55.47. A waiver may be considered in accordance with the criteria in 10 CFR 55.47 (a)(1), (a)(2) and (a)(3). In accordance with the criteria, STPNOC provides the following as a basis for granting a waiver.

10 CFR 55.47 (a)(1) requires that the applicant has had extensive actual operating experience at a comparable facility, within two years before the date of application.

As indicated in Enclosure 1 of this submittal, Mr. Denton has had extensive experience where he stood watch as a licensed reactor operator at STP from October 2011 to August 2015. However, as noted in Enclosure 1, it has been greater than two years since Mr. Denton has stood watch. He did not meet the two year eligibility requirement. Refer to Enclosure 1 for the requested exemption from this portion of the requirement of 10 CFR 55.47 (a)(1).

10 CFR 55.47 (a)(2) requires that the applicant has discharged his or her responsibilities competently and safely and is capable of continuing to do so.

Mr. Denton previously stood watch as a licensed reactor operator at STP operating the controls safely and competently. Mr. Denton stood watch from October 2011 until August 5, 2015 (over 1000 hours). During this period as a licensed reactor operator, he successfully completed the required annual operating exams in 2012, 2013, and 2014. In 2013, he also successfully completed the biennial written exam.

10 CFR 55.47 (a)(3) requires that the applicant has learned the operating procedures for and is qualified to operate competently and safely the facility designated in the application.

As indicated in Enclosure 1, Mr. Denton has completed additional training through self-study and one-on-one instruction. He successfully passed all written examinations for each requalification cycle as well as the biennial licensed operator requalification written examinations he missed while away from STP. He also passed a Generic Fundamentals of Engineering exam and completed and passed simulator operating tests and Job Performance Measure (JPM) walkthrough tests.

Additionally, Mr. Denton has spent a total of 120 hours on shift as indicated in Enclosure 1. This included 60 hours on shift instruction in the position of reactor operator and 60 hours as a non-licensed operator performing plant walk downs for re-familiarization.

Based on the information provided above and in Enclosure 1, Mr. Denton has discharged his responsibilities competently and safely as a licensed reactor operator and is capable of continuing to do so.