

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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February 10, 1994

Docket Nos. 50-213  
50-245  
50-336  
50-423  
B14734

Re: 10CFR26.21(b)  
10CFR26.6

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Gentlemen:

Haddam Neck Plant  
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3  
Request for a Scheduling Exemption from Fitness-for-Duty Requirements

Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) request a one-time exemption to the requirement stated in 10CFR26.21(b) that Fitness-for-Duty (FFD) refresher training be provided on a nominal annual basis.

### Summary

Title 10 of the Code of Federal Regulations, Part 26, requires, in part, that FFD refresher training be completed on a nominal 12-month frequency or more frequently where the need is indicated. CYAPCO and NNECO request a one-time exemption from the requirement of 10CFR26.21(b) for on-shift personnel.

### Discussion

CYAPCO and NNECO are initiating changes to the operator training program in order to further improve the quality of the training. Among the planned changes is the consolidation of the various annual training requirements, (e.g., unescorted access training, radiation worker training, and FFD refresher training, etc.) into a single week of training for each shift.

This change provides several benefits. It provides the opportunity for the operators from four nuclear units to receive a portion of their training together. This promotes sharing lessons learned and good practices and fosters a greater degree of standardization than would otherwise occur. With the present process, the schedule for these courses results in interruption of the work shift, interruption of operator training, or requires overtime to

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accomplish. Delivering this training in discreet 1-week blocks for each shift is intended to eliminate these problems. Additionally, this new schedule creates six 1-week periods throughout the year when the training staff has time scheduled to refine and improve the training programs, or to receive additional training themselves.

Currently, training is individually scheduled on a nominal 12-month frequency. With the new training schedule, this training will be provided in February, March, May, July, August, and October 1994. Therefore, a potential exists for individuals who would have been scheduled to receive FFD refresher training during January under the old schedule, to go until October before receiving this training. In addition, there will be individuals whose scheduled training interval is extended for shorter durations. However, the 9-month delay is the most bounding, so an overall extension from 12 to 21 months is requested.

CYAPCO and NNECO are confident that affected personnel understand the FFD program and requirements, and that no adverse impact will result from this requested change. Between the four units, approximately 15 percent of the on-shift personnel will fall outside of the nominal 12-month window. All of the individuals have received FFD training in the past, and will read and sign a synopsis of the FFD requirements prior to exceeding the nominal 12-month window. In addition, within each shift, the supervisory personnel will be trained within the nominal 12-month frequency pursuant to 10CFR26.22.

The Staff granted a similar extension to Omaha Public Power District in a letter dated April 22, 1993.<sup>(1)</sup>

Once training has transitioned to this new schedule, a possibility exists for an employee who begins shift work, changes shifts, or leaves shift work to miss FFD refresher training on a nominal 12-month basis. CYAPCO and NNECO are investigating three possible solutions: interim required reading assignments when changing shifts, a permanent exemption to allow all training to be performed on an annual basis, or to propose rulemaking to revise 10CFR26.21(b).

### Conclusion

10CFR26.6 states that the Commission may grant exemptions from the requirements of the regulations in this part (10CFR26) that it determines are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. A one-time schedular exemption from the requirements of 10CFR26.21(b) is justified based upon the attention to FFD which is prevalent at CYAPCO and NNECO, the fact that on-

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(1) S. Bloom letter to T. L. Patterson, "Exemption from the Requirements of 10CFR26.21(b) — Fitness-for-Duty Refresher Training — Fort Calhoun Station, Unit 1 (TAC No. M86004)," dated April 22, 1993.

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shift supervisory personnel will be trained within the nominal 12-month frequency, and the additional benefit to training that will be gained by the new process.

CYAPCO and NNECO request that this exemption be granted by March 31, 1994, to support this transition.

If you should have any questions, please contact us.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

  
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Executive Vice President

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