

YANKEE ATOMIC ELECTRIC COMPANY

2.C.2.1
FYR 83-30



1671 Worcester Road, Framingham, Massachusetts 01701

March 15, 1983

United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch No. 5
Division of Licensing

References: (a) License No. DPR-3 (Docket No. 50-29)
(b) YAEC Letter to USNRC, dated October 2, 1981 (FYR 81-139)

Subject: Inservice Inspection Program Revision

Dear Sir:

In regard to the Yankee Inservice Inspection Program submitted in Reference (b), Yankee Atomic requests the following change be made to Section 3.10, "Personnel Qualification Requirements".

Yankee Atomic takes exception to requirements of Subarticle IWA 2300(C) of the 1977 Edition with Summer 1978 Addenda of the ASME Section XI code, for certain personnel performing VT-2 hydrostatic exams. These personnel will be considered qualified to perform hydrostatic pressure tests if they possess a Third Class Steam Engineers License from the Massachusetts Department of Public Safety and a Reactor Operators License from the U.S. Nuclear Regulatory Commission.

To be eligible for examination for a Third Class Steam Engineers License in the State of Massachusetts, a candidate must furnish to the State Department of Public Safety, written evidence as to his previous training and experience and he must have been employed in a boiler or steam plant as an Engineer Assistant (or equivalent) for at least a year and a half. A Third Class Engineer must be able to demonstrate a complete and thorough knowledge of boiler control systems, pressure, the fundamental principles of steam turbines and the procedure for the safe operation of the plant at which he is employed. The application for this exam must also be endorsed by a steam engineer holding the same or higher grade of license.

Yankee Atomic believes that the requirements for a Third Class Steam Engineer's License along with the training and physical requirements for the Reactor Operator License (eye exam, color vision, etc) satisfy the intent of IWA 2300 and any additional training or examination would not be required, and will not compromise the effectiveness of our ISI program.

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United States Nuclear Regulatory Commission
Attention: Officer of Nuclear Reactor Regulation

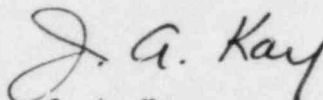
March 15, 1983
Page 2

This exemption from Section XI of the ASME Code will become a permanent addition to our ISI program for VT-2 hydrostatic exams only.

If you have any questions, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



J. A. Kay
Senior Engineer - Licensing

JAK/ba