

**TP** custom training programs  
P.O. Box 277 Bloomfield, Conn. 06002

RECEIVED  
LSNAC

'85 MAR 10 P4:05

March 13, 1985  
DOCKETING & SERVICE  
BRANCH

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Sir:

I have reviewed your proposed changes to 10 CFR Part 55 and have found that some of the changes threaten or could threaten my ability to conduct the business which I have been engaged in for the last 5 and one-half years. I am a sole proprietor.

I provide training services for nuclear power plants. These services include classroom instruction for NRC license candidates on the theory of power plant operation, preparation of 35 MM slide lectures for plant systems, and writing of system descriptions.

Parts 55.2.b and 55.4 essentially state that any individual who instructs any individual on the way to manipulate a control of any facility must have a Senior Operator License or a Special Senior Operator License for that facility.

This statement could be interpreted to mean that I could not provide any type of instruction, whether in the classroom, or in a 35 MM slide lecture, or in a system description, on any control which directly affects core reactivity. An example of this would be the rod control switch. As the proposed changes are written, they could be interpreted to mean that I would not be able to explain, in the classroom, how an operator should manipulate the rod control switch during an approach to criticality or when changing power level without a Special Senior Operator License. I also would not be able to explain how to operate the rod control switch in a system description or a 35 MM slide lecture.

In addition, a designer of a control rod drive system could be prevented from giving a classroom lecture on his system to operators of a nuclear power plant under construction or in operation without possessing a Special Senior Operator License.

8503200429 850313  
PDR PR  
50 49FR46428 PDR

DSIO  
add: Bruce Boyer, AR-5221

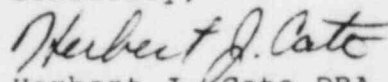
 Custom training programs  
P.O. Box 277 Bloomfield, Conn. 06002

A control which directly affects core reactivity can be construed to mean many things. I would say that the rod control switch directly affects core reactivity. Some may say that the load limit control on the turbine, or the boric acid transfer pump control switch, or the reactor trip push button directly affects core reactivity. With the present wording, many people in the field with expertise in their areas may be denied the privilege of imparting their knowledge to nuclear power plant operators because it will not be possible for them to obtain a Special Senior Operator License.

I suggest that the wording of the proposed changes to 10 CFR Part 55 be changed to state that, "Any individual who instructs any individual about the way to manipulate the controls of any facility at the control panels of that facility or the simulator panels of that facility shall have a Senior Operator License or a Special Senior Operator License". This will insure competent instruction at the control panels of the facility. It will not prevent other persons from imparting their knowledge to the power plant operators.

I have been working in the nuclear field since 1963 and have learned much about nuclear power. I have held an Operator License and a Senior Operator License for the Ginna Nuclear Power Plant which is owned by Rochester Gas and Electric. I have attached a brief resume of my past experience. If you would like to see any samples of the work I am presently doing, I will be glad to send some to you at your request.

Sincerely,



Herbert J. Cato DBA  
Custom Training Programs

HERBERT J. CATO  
231 Woodland Avenue  
Bloomfield, Connecticut 06002

March 13, 1985  
Home: 203-243-1110  
Work: 203-242-3873

#### WORK EXPERIENCE

1979-Present    TRAINING CONSULTANT    SELF EMPLOYED

Provide classroom instruction in the area of Heat Transfer, Fluid Flow, Thermodynamics, Basic Electricity, and Reactor Theory for nuclear power plant operators and shift technical advisors. Classroom instruction has been provided for Yankee, Maine Yankee, Arizona, and Omaha Public power District.

Have written descriptions of nuclear power plant systems and have put together 35 MM slide lectures for nuclear power plant systems.

Performed an independent review of new emergency procedures for the Yankee Nuclear Power Plant. This review was done with the assistance of some power plant operators.

1973-1979    SENIOR NSSS ENGINEER    COMBUSTION ENGINEERING

Simulator Instructor.

Classroom Instructor.

Provided NSSS (Nuclear Steam Supply System) lectures to the operating staff at the San Onofre and Louisiana (Waterford) nuclear power plants. The lectures were on Core Operating Characteristics and Reactor Protection Systems.

Gave lectures on Reactor Theory and/or Turbine Control Systems to operators of the Saint Lucie and Arkansas-2 nuclear power plants at the plant sites.

Startup Engineer at the Calvert Cliffs Unit-2 nuclear power plant.

1968-1973

OPERATOR AND TRAINING COORDINATOR

ROCHESTER GAS AND ELECTRIC CORPORATION

Auxiliary Operator at the Ginna Nuclear Power Plant during construction and startup of the plant.

Control Room Operator at the Ginna Nuclear Power Plant. Had NRC Operator License.

Training Coordinator. Held NRC Senior Operator License.

1958-1968

MACHINIST MATE U.S. NAVY

Conventional Submarines.

Nuclear Submarines.

In-plant instructor at the S1C nuclear power prototype.

Classroom Instructor at the S1C nuclear power prototype.

Leading Petty Officer in charge of classroom instruction for Primary and Secondary Systems at the S1C nuclear power prototype.

EDUCATION

High School Graduate

University of North Carolina 1.5 years

U.S. Navy Machinist Mate Class A School

U.S. Navy Nuclear Power School - Basic Training

U.S. Navy Nuclear Power School - Prototype Training

U.S. Navy Lithium Bromide Air Conditioning School

Bell & Howell TV Repair Course - Home Study