

August 20, 2013

**Richard St. Onge**  
Director, Nuclear Regulatory Affairs and  
Emergency Planning

10 CFR 50.2

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Subject: **Docket No. 50-361 and 50-362**  
**Request for Approval of the Safe Storage Shift Manager/  
Certified Fuel Handler Training Program**  
**San Onofre Nuclear Generating Station Units 2 and 3**

- Reference:
1. Letter from P. T. Dietrich (SCE) to the U. S. Nuclear Regulatory Commission (NRC) dated June 12, 2013; Subject: Certification of Permanent Cessation of Power Operations San Onofre Nuclear Generating Station, Units 2 and 3
  2. Letter from P. T. Dietrich (SCE) to the U. S. Nuclear Regulatory Commission (NRC) dated June 28, 2013; Subject: Permanent Removal of Fuel from the Reactor Vessel, San Onofre Nuclear Generating Station Unit 3
  3. Letter from P. T. Dietrich (SCE) to the U. S. Nuclear Regulatory Commission (NRC) dated July 22, 2013; Subject: Permanent Removal of Fuel from the Reactor Vessel, San Onofre Nuclear Generating Station Unit 2

Dear Sir or Madam:

Pursuant to 10 CFR 50.2, Southern California Edison (SCE) hereby requests the Nuclear Regulatory Commission (NRC) approval of the San Onofre Nuclear Generating Station Units 2 and 3 (SONGS 2 and 3) Safe Storage Shift Manager (SM) / Certified Fuel Handler (CFH) Training Program.

SCE has submitted a certification of permanent cessation of power operations for SONGS 2 and 3 in accordance with 10 CFR 50.82(a)(1)(i) (Reference 1) and a certification of permanent removal of fuel from the reactor vessel for SONGS 2 and 3 in accordance with 10 CFR 50.82(a)(1)(ii), (References 2 and 3). Accordingly, pursuant to 10 CFR 50.82(a)(2), the 10 CFR Part 50 licenses for SONGS 2 and 3 no longer authorize operation of the reactor or emplacement or retention of fuel in the reactor vessel. Based on this acknowledgement, plant operating activities which require Licensed Operators and Senior Reactor Operators will no longer be conducted.

A copy of the proposed Safe Storage SM/CFH Training Program for SONGS 2 and 3 is provided in Attachment 1. SCE requests approval of the Safe Storage Shift Manager / Certified Fuel Handler Training Program by November 30, 2013 to support removal of the licensed operator training requirements.

The SONGS 2 and 3 SM/CFH Training Program ensures that the qualifications of the Shift Manager and Certified Fuel Handlers are commensurate with the tasks to be performed and the conditions requiring response. 10 CFR 50.120, "Training and qualification of nuclear power plant personnel," requires training programs to be established, implemented, maintained, and derived using a systems approach to training (SAT) as defined in 10 CFR 55.4. The requirements of 10 CFR 50.120 apply to holders of operating licenses issued under Part 50. Even though the SCE licenses no longer authorize operation of SONGS Units 2 and 3, the enclosed Shift Manager/Certified Fuel Handler training program nonetheless aligns with the requirements of 10 CFR 50.120. The five key elements are: (1) analysis of job performance requirements and training needs, (2) derivation of learning objectives based on the preceding analysis, (3) design and implementation of the training program based upon learning objectives, (4) trainee evaluation, and (5) program evaluation and revision.

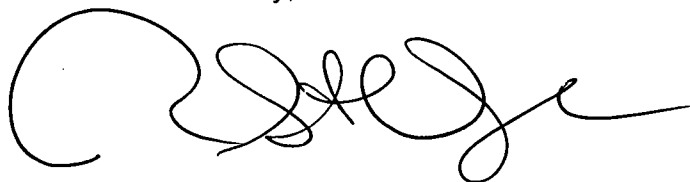
The SONGS 2 and 3 Safe Storage SM/CFH Training Program provides adequate confidence that appropriate SAT based training of personnel who will perform Shift manager and Certified Fuel Handler duties is conducted to ensure the facility is maintained in a safe and stable condition. The program allows for changes to be made to the program without prior NRC approval provided the program continues to comply with ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971, consistent with level of hazard at the facility and to ensure the facility is maintained in a safe and stable condition.

By a separate submittal, SCE intends to submit an exemption request to 10 CFR 50.54(m) and 10 CFR 55 to allow elimination of licensed operators for SONGS Units 2 and 3.

There are no new commitments contained in this letter.

If you have any questions regarding this matter, please feel free to contact Mr. Mark Morgan, Licensing Lead, at 949-368-6745.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Morgan', written in a cursive style.

Attachment 1: Safe Storage Shift Manager / Certified Fuel  
Handler Training Program

cc: S. A. Reynolds, Regional Administrator, Acting, NRC Region IV  
R. Hall, NRC Project Manager, San Onofre Units 2 and 3  
B. Benney, NRC Project Manager, San Onofre Units 2 and 3  
G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 and 3

## **ATTACHMENT 1**

### **SAFE STORAGE SHIFT MANAGER / CERTIFIED FUEL HANDLER TRAINING PROGRAM**



**Safe Storage Shift Manager / Certified Fuel Handler  
Training Program Description (TPD)**

**SO23-XXI-TPD-SMCFH  
REV: 0**

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Procedure Usage Requirements	Sections
<p>Information Use</p> <ul style="list-style-type: none"> <li>The user may complete the task from memory. However, the user is responsible for performing the activity according to the procedure.</li> <li>Information use documents that contain a specific process order are performed in the given order unless otherwise specified within the document.</li> </ul>	<p>ALL</p>

Color Usage	Location
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Level 1 – QA PROGRAM AFFECTING

50.59 DNA / 72.48 DNA / RX DNA

Procedure Type
Training

Procedure Owner
Richard Davis



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## Safe Storage Shift Manager / Certified Fuel Handler Training Program Description (TPD)

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### 1.0 PURPOSE AND SCOPE

- 1.1 The Shift Manager/Certified Fuel Handler (SM/CFH) training and retraining program contained herein describes the training program to be implemented by SONGS to ensure the monitoring, handling, storage, and cooling of nuclear fuel is performed in a manner consistent with ensuring the public health and safety. The program describes the personnel to whom the program applies, the areas in which training is provided, what constitutes certification, how certification is maintained, and required qualifications (e.g., medical).
- 1.2 The program shall be in accordance with ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971, consistent with the level of hazard at the facility and to ensure the facility is maintained in a safe and stable condition. Changes to this program may be made without prior Nuclear Regulatory Commission (NRC) approval provided the program continues to comply with ANSI N18.1-1971.
- 1.3 The SONGS SM/CFH training and retraining program becomes effective after the NRC has provided approval of the program. Training of personnel assigned to the SM/CFH position can be conducted prior to the program being approved by the NRC.
- 1.4 The Manager, Operations (or delegate) may exempt an individual from a specific training requirement based upon the individual's depth of experience and previous training. Such exemptions, including the basis, shall be documented and retained in accordance with SO23-XXI-TRN. Also refer to Section 6.3.11.
- 1.5 Initial training ensures that entry-level personnel attain the required knowledge and skills to perform the duties of the SM/CFH. Continuing training ensures that incumbents maintain and improve job performance.
- 1.6 A "systems approach to training" (SAT) process (per 10CFR 55.4) will be used for the SM/CFH training and retraining program. The program adheres to the guidelines of NUREG-1220, "Training Review Criteria and Procedures."
  - 1.6.1 The SAT process contains the following elements:
    - Analysis of job performance requirements and training needs
    - Derivations of learning objectives based upon the preceding analysis
    - Design, development, and implementation of the training program based upon learning objectives
    - Trainee evaluation
    - Program evaluation and revisions



## Safe Storage Shift Manager / Certified Fuel Handler Training Program Description (TPD)

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### 2.0 **RESPONSIBILITIES**

#### 2.1.1 SM/CFH Candidate:

- Complete all assigned qualification tasks and documentation in accordance with SONGS procedures and Operations Division expectations prior to performing duties as the SM/CFH
- Attend continuing training as assigned
- Provide student feedback to the training division

#### 2.1.2 Manager, Operations:

- Select individuals to perform the function of the SM/CFH
- Provide approval for the training program
- Ensure the training program meets Operations Division expectations
- Allocate resources necessary to implement the training program

#### 2.1.3 Supervisor, Training:

- Monitor individual candidate performance to determine when intervention is required due to marginal or failing performance
- Provide status of the training program as requested by the Manager, Operations
- Consult with Manager, Operations to implement the training program and allocate resources necessary to implement the training program



## Safe Storage Shift Manager / Certified Fuel Handler Training Program Description (TPD)

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### 3.0 DEFINITIONS

- 3.1 Certified Fuel Handler (CFH): A non-licensed operator who has qualified in accordance with a fuel handler training program approved by the Commission (from 10CFR 50.2).
- 3.2 Department Training Coordinator (DTC): One of more persons selected by each department's manager (training program owner) to perform training activities for that department.
- 3.3 Job Performance Measure (JPM): A training and/or evaluation instrument that outlines the prerequisite training along with the critical knowledge and skills a trainee must master in order to be qualified to perform a task independently. The JPM documentation is prepared at the task level and developed to measure an employee's performance of a task during training on-the-job or for task qualification. JPMs may also be used where no qualification is to be granted (e.g., annual performance tests).
- 3.4 Operating Exam: An evaluation of an operator's ability to independently perform a task to an established standard. An example would be one or more job performance measures (JPMs).
- 3.5 Safe Storage (SAFSTOR): A method in which a nuclear facility is placed and maintained in a condition that allows the facility to be safely stored and subsequently to levels that permit release for unrestricted use.
- 3.6 Training Program Owner (TPO): The line manager or supervisor who has direct responsibility for the determination and approval of the scope and content of a training program, for the scheduling of training, and for the qualification of their respective work group(s).

### 4.0 PRECAUTIONS AND LIMITATIONS

- 4.1 None

### 5.0 PREREQUISITES

- 5.1 **VERIFY** this document is current by using one of the methods described in SO123-XV-HU-3.
- 5.2 **VERIFY** Level of Use requirements on the first page of this procedure.

## INFORMATION USE



## Safe Storage Shift Manager / Certified Fuel Handler Training Program Description (TPD)

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### 6.0 PROCEDURE

#### 6.1 Applicability

- 6.1.1 The program is designed to ensure personnel are qualified to perform assigned tasks. The program applies to individuals selected as a shift manager/certified fuel handler for SAFSTOR.

#### 6.2 Entry Level / Experience Requirements

- 6.2.1 The Human Resources Department defines entry-level requirements for each job position in accordance with ANSI N18.1 1971.

#### 6.3 Initial Training Requirements

- 6.3.1 The goal of initial training is to familiarize the individual with the various aspects of nuclear technology associated with SONGS and to ensure that they hold paramount the safety, health, and welfare of the public in the performance of their duties.
- 6.3.2 The initial training program consists four phases:
- Required Reading (Section 6.3.6)
  - Fundamentals Training (Section 6.3.7)
  - On-the-Job Training and On-Shift Time (Section 6.3.8)
  - Final qualification, which includes an oral board, a comprehensive written exam, and a JPM exam (Section 6.3.9)
- 6.3.3 Additionally, the SM/CFH candidate must complete qualification as the Emergency Coordinator (EC) prior to performing duties as the SM/CFH in the plant. This requires completion of the EC qualification card (located in SAP as encode 72AQWT).
- 6.3.4 The SM/CFH candidate shall complete, or be exempted from, all or portions of the certified operator (CO) training program. The Manager, Operations may grant exemptions based on the candidate's previous education and experience. Previously licensed SONGS senior reactor operators or reactor operators are exempt from all portions of the certified operator (CO) training program.
- 6.3.5 Completion of all phases of qualification is documented in the SM/CFH qualification guide. The phases shall be administered as described below. (Attachment 3)



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6.3.6 Required Reading

6.3.6.1 The candidate will complete (or be exempted from) all required reading either prior to or during the qualification process to become familiar with site processes and regulations. A comprehensive exam at the end of the course will provide assurance that the candidate is familiar with site processes and regulations.

6.3.7 Fundamentals Training

6.3.7.1 Individuals who were previously licensed as reactor operators or senior reactor operators at SONGS, or who have passed the Generic Fundamentals (GFES) exam, are exempt from the fundamentals theory portion of the qualification (course SM-02 in the qualification guide).

6.3.7.2 The fundamental training phase of the SM/CFH training program consists of lecture and/or self-study of topics appropriate to the monitoring, handling, storage, and cooling of nuclear fuel. Depending on an analysis of the candidate's background, self-study may be used for up to 100% of the course material. A written exam at the end of the fundamentals phase will provide assurance that the material was properly learned.

6.3.7.3 Typically fundamentals topics include a review of the theory (thermodynamics, heat transfer, fluid mechanics, radiological safety principles and monitoring, electrical theory, valve and pump operation), administrative processes, and plant systems required to support SONGS' safe storage.

6.3.8 On-the-Job Training (OJT) and On-Shift Time

6.3.8.1 On-the-job training and on-shift time permits hands-on training of shift operations such as shift turnover, log keeping, and removal and return of equipment to service. Each candidate shall complete (or be exempted from) at least five full shifts of on-shift time under the instruction of a qualified SM/CFH. The candidate shall be present for both ongoing and off-going turnover of the SM/CFH duties during the shift.



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**6.3.9 Final Qualification**

- 6.3.9.1 Once the trainee has completed the required reading phase, fundamentals phase, on-the-job-training phase, under instruction watches, and the EC qualification, they are ready to enter the final qualification phase. An oral board, a comprehensive written examination, and an operating examination consisting of JPMs will be administered. Areas examined are described in Attachments 1 and 2 for the written and operating examinations, respectively (oral board questions can be derived from topics listed in either Attachments 1 and/or 2).
- 6.3.9.2 The written examination requires a minimum score of 80% to pass.
- 6.3.9.3 The oral examination requires a minimum score of 80% to pass.
- 6.3.9.4 The operating examination will consist of five JPMs. In order to pass a JPM, the examinee will be required to perform the task per the procedure. Missed or incorrectly performed critical steps are the bases for failure. Each JPM will be scored on a pass/fail basis. The candidate must pass 80% of the JPMs administered to successfully pass the operating examination.
- 6.3.9.5 Qualification will be granted upon completion of the following:
- Complete the SM/CFH qualification guide or have the phase(s) exempted
  - Score at least 80% on a comprehensive written examination and the fundamentals exam
  - Pass at least 80% of the administered JPMs on the final examination
  - Achieve a score of at least 80% on the oral board
  - Complete a respirator physical exam and fit test to meet emergency response organization commitments
  - Complete medical examinations as directed by the Manager, Operations and the Medical Review Officer to meet any facility license, emergency response organization, fire brigade, or other commitment
- 6.3.9.6 Completion of the candidate's final qualification will be documented on the appropriate qualification matrix. The completed qualification guide and any exemption forms with supporting documentation shall be forward to Records for retention.



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- 6.3.10 Remediation
- 6.3.10.1 An individual who fails to pass administered exams shall not perform SM/CFH duties until he/she has completed a remedial training program and passed an appropriate examination.
- 6.3.11 Exemption of Training Requirements
- 6.3.11.1 Exemptions will be processed in accordance with SO23-XXI-TRN.
- 6.3.11.2 The Manager, Operations (or delegate) may exempt an individual from a specific training requirement based upon the individual's depth of experience and previous training. Any exemption(s) granted shall be based on an evaluation of the candidate's training and/or work history to ensure that the intent of the exempted training's objectives is satisfied. Such exemptions, including the basis, shall be documented in accordance with SO23-XXI-TRN. The Manager, Operations (or delegate) shall approve the basis for evaluations qualifying an individual as an SM/CFH. The requirement for a medical examination shall not be exempted.
- 6.3.11.3 Personnel qualified as both shift manager (SM) and emergency coordinator (EC) prior to SONGS decommissioning has met all the requirements of this program and may be exempted from all portions of the SM/CFH qualification guide in accordance with SO23-XXI-TRN.
- 6.3.11.4 Those personnel who were not formerly qualified as shift manager but do have an NRC-issued senior reactor operator or limited senior reactor operator license may be exempted from all of the qualification card requirement for SM/CFH at the discretion of the Manager, Operations, EXCEPT for the requirement to qualify as the Emergency Coordinator, which must be completed prior to standing watch as the SM/CFH.
- 6.3.11.5 Training of individuals who hold an NRC-issued reactor operator license for SONGS may be evaluated to determine if they can be exempted from portions of the qualification guide. IF portions of this program are needed to qualify any of these individuals as a SM/CFH, THEN those parts of the qualification guide shall be completed. The Manager, Operations shall work with the candidate and the Supervisor, Training to evaluate the differences between the requirements of an SM/CFH and the licensed reactor operator and ensure the required training and evaluations occur.
- 6.3.11.6 The training program allows for the evaluation of other SONGS personnel to determine if portions of the required training have already been completed and may be exempted. The evaluation will concentrate on areas that determine if the level of training and examination were the same as that required for an SM/CFH.



## 6.4 Continuing Training Requirements

### 6.4.1 Schedule

6.4.1.1 The SM/CFH retraining program shall be a biennial cycle. This cycle includes a biennial examination. Biennial is defined in NUREG-1021, "Operator Licensing Examination Standards for Power Reactors." The content of the retraining plan, any examinations, and the retraining schedule will be developed by the Supervisor, Training or the DTC and will be approved by the Manager, Operations. The training plan will be developed utilizing the SAT process described in Section 1.6.

6.4.1.2 The SM/CFH retraining program consists of lecture and/or self-study of topics appropriate to the monitoring, handling, storage, and cooling of nuclear fuel.

6.4.1.3 Retraining will typically include a review of changes associated with the facility and procedures, as well as problem areas associated with the monitoring, handling, storage, and cooling of nuclear fuel, applicable operating experience, selected topics from the initial training program, and other training needed to correct performance problems.

6.4.1.4 Continuing training may include just-in-time-training (JITT) on topics identified by the Manager, Operations. JITT may be any combination of required reading, training briefs, self-study, lecture, or JPM.

### 6.4.2 Missed Training

6.4.2.1 Any missed material or examination must be made up within 90 days of the training. IF the required training is not completed within the makeup period, THEN the SM/CFH shall be suspended from duty pending completion of retraining.

### 6.4.3 Evaluation and Remediation

6.4.3.1 A biennial examination shall be administered. This may consist of a written and/or operating exam. Areas examined are described in Attachments 1 and 2 for the written and operating examinations, respectively. The examination requires a minimum score of 80% to pass. In order to pass a JPM, the examinee will be required to perform the task per the procedure. Missed or incorrectly performed critical steps are the bases for failure.

6.4.3.2 Additional written and/or operating exams may be administered periodically during the retraining cycle to assess student knowledge and training effectiveness as determined by the Training Program Owner (TPO).

6.4.3.3 An individual who fails to pass administered examinations shall not perform SM/CFH duties until a remedial training program is completed and an appropriate examination is passed.



## Safe Storage Shift Manager / Certified Fuel Handler Training Program Description (TPD)

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### 6.4.4 Maintenance of Qualifications

6.4.4.1 To maintain the SM/CFH qualification, the following requirements must be satisfied or exempted:

- Complete the SM/CFH retraining program
- Score at least 80% on the biennial examination
- Pass any required medical exams
- Stand the SM/CFH watch for a minimum of one full shift per calendar quarter.
  - An SM/CFH who fails to meet this time requirement can regain qualified status by standing one full shift under the instruction of a qualified SM/CFH. The time under instruction should include a review of the spent fuel pool cooling system, shift turnover procedures, operations in progress or planned, and any JITT issued.

6.4.4.2 An individual who fails to meet any of the requirements for maintaining the SM/CFH qualification shall be removed from all duties associated with that position until such time as the discrepancies can be resolved. The operating shifts shall be notified of the individual's removal and subsequent status.

### 6.4.5 Exemptions

6.4.5.1 The Manager, Operations may exempt an individual from a specific retraining requirement. Such exemptions, including the basis, shall be documented. The requirement for a medical examination shall not be exempted. An individual shall not be exempted from examinations unless that individual prepared, reviewed or approved the examination. No individual may be exempted from two consecutive examinations.

### 6.4.6 Program Evaluation

6.4.6.1 As part of the training process, routine assessments of the effectiveness and accuracy of training are made by appropriate SONGS management personnel during and at the end of each two-year retraining cycle. Any required changes to the program determined by station management shall be incorporated into the program.

## 6.5 Standards

6.5.1 Refer to Operations Standards Manuals.

## 7.0 ACCEPTANCE CRITERIA

7.1 None

## INFORMATION USE



**8.0 RETENTION OF RECORDS**

8.1 Qualification records shall be collected and maintained by the Training Program Owner.

**9.0 REFERENCES / COMMITMENTS**

**9.1 Implementing Reference**

9.1.1 Procedures

9.1.1.1 SO123-XV-HU-3, Written Instruction Use and Adherence

9.1.1.2 SO23-XXI-TRN, Conduct of Training

9.1.2 Other

9.1.2.1 ANSI N18.1 (1971), Selection and Training of Nuclear Power Plant Personnel

9.1.2.2 NUREG-1220, Training Review Criteria and Procedures

9.1.2.3 NUREG-1021, Operator Licensing Examination Standards for Power Reactors

9.1.2.4 10CFR 50.2 Definitions

9.1.2.5 10CFR 55.4 Definitions

9.1.2.6 Regulatory Guide 1.8 Revision 1 Personnel Selection and Training (1975)

9.1.2.7 SONGS UFSAR Chapter 17 Quality Assurance Program

**9.2 Developmental References**

9.2.1 Commitments

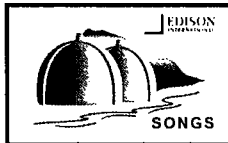
9.2.1.1 None

9.2.2 Corrective Actions to Prevent Recurrence (CAPR)

9.2.2.1 None

9.2.3 Procedures

9.2.3.1 None



**Safe Storage Shift Manager / Certified Fuel Handler  
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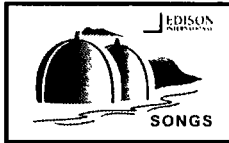
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Written Examination Areas

**Attachment 1**

The written examination shall include a sample of the following aspects of the SM/CFH position:

1. Design, function, and operation of systems used in handling, storage, cooling, and monitoring of nuclear fuel.
2. Purpose and operation of the radiation monitoring systems.
3. Radiological safety principles and procedures including radiation hazards that may arise during normal, maintenance, and abnormal activities.
4. Principles of heat transfer, thermodynamics, and fluid mechanics as they apply to fuel Handling, storage, cooling, and monitoring.
5. Conditions and limitations of facility license, including content, basis and importance of Technical Specifications.
6. Assessment of facility condition and selection of appropriate procedures during normal, abnormal and emergency situations.
7. Fuel handling facilities and procedures.



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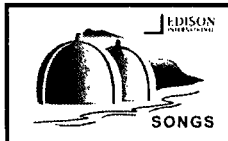
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Operating Examination Areas

**Attachment 2**

The operating examination will consist of job performance measures (JPMs) and shall include a sample of the following aspects of the SM/CFH position:

1. Evaluate annunciators; valve, pump, and breaker status indicators; and instrument readings to determine/perform appropriate remedial actions.
2. Evaluate the ability to manipulate the controls required to obtain desired operating results during normal, abnormal, and emergency conditions. This includes the spent fuel pool cooling system and those auxiliary and emergency systems that could affect the release of radioactive material to the environment.
3. Evaluate radiation monitoring system readings, including alarm conditions, to determine appropriate actions. Such actions may include setting an alarm setpoint to monitor a release or determine appropriate remedial actions for an alarm condition.
4. Evaluate abnormal or emergency conditions to determine if the emergency plan for the facility should be implemented and, if implemented, evaluate performance of duties as directed by the emergency plan.



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SM/CFH Qualification Guide

**Attachment 3**

TRAINEE NAME: \_\_\_\_\_ PERNR: \_\_\_\_\_

START DATE: \_\_\_\_\_

<b>PREPARED BY:</b>	_____	_____	_____
	Printed Name	Instructor's Signature	Date
<b>REVIEWED BY:</b>	_____	_____	_____
	Printed Name	DTC/Training Supervisor Signature	Date
<b>APPROVED BY:</b>	_____	_____	_____
	Printed Name	Training Program Overview Signature (Appropriate Department)	Date

Retention: Life of Plant Insurance Policy + 10 years  
Retain in: Personnel Training Records  
Disposition: Trainee, Training Supervision, and Training Program Owner



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SM/CFH Qualification Guide

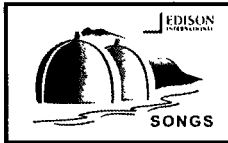
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**1.0 INTRODUCTION**

The purpose of this qualification guide is to document a trainee's completion of training, evaluation, and qualification activities. A trainee shall successfully complete training, evaluation, and qualification activities prior to independently standing the Shift Manager/Certified Fuel Handler position at SONGS. When plant conditions allow unique in-plant training opportunities, task training may be performed out of the normal sequence; however, task evaluation cannot be performed until prerequisites have been completed. This qualification guide may be modified to meet site specific training program requirements.

**2.0 DEFINITIONS**

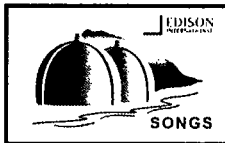
Coaching: The providing of immediate and frequent feedback to the trainee by the trainer/Interviewer on task performance and knowledge requirements. Coaching is NOT allowed during the evaluation phase.

Prerequisite: Knowledge and/or skills that a trainee must obtain prior to beginning training and/or evaluation on a given task.

Prompting: Providing assistance to the trainee that jeopardizes the ability to evaluate the trainee's ability to perform the task independently. Prompting is NOT allowed during task evaluation by the evaluator or anyone else.

**3.0 CHANGES TO THE QUALIFICATION GUIDE**

Changes to the qualification guide will be made in accordance with the training procedures. If you have problems, questions, or concerns when using this qualification guide, contact your supervisor. A training request may also be initiated to identify areas for improvement.



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#### 4.0 QUALIFIED TRAINERS AND EVALUATORS

Signatures are by position titles. If a position is vacant (or has a different title), the TPO should indicate the individual(s) qualified to sign the qual guide. This is not a qualification guide change. The department manager should initial / date any changes to designee assignments. Managers or supervisors may also sign for positions that report to them.

Individuals assigned to positions that are specified for knowledge signatures do not have to have specific qualifications in a given area; rather, they must be knowledgeable on the subject or topic. Each signature block provides guidance to individuals for the activities specified.

The individual signing for the shift manager under instruction watch shall:

- Meet ALL requirements to stand the shift manager watch at the station
- Ensure the length of the under instruction watch is for the complete duration of the shift
- Ensure that the under instruction watch is documented in the Operations Log.

#### 5.0 PERFORMANCE LEVELS

Tasks contained in the qualification guide specify a performance level in the form of "P" (Perform), "S" (Simulate), or "D" (Discuss). The performance level designation specifies the acceptable method(s) by which a trainee may complete a given task.

The Manager, Operations will designate if any task shall have a restrictive performance level, such as "Perform-only".

Sometimes it may be necessary to change the specified performance level for a task in a given situation (i.e., a task cannot be performed due to plant conditions and waiting for the appropriate plant conditions would unnecessarily delay the completion of training and evaluation on the task). On a case-by-case basis, the performance level may be changed with the concurrence of the program owner. This is accomplished by lining out the indicated performance level, specifying the new performance level, and having the change initialed and dated by the Manager, Operations. If a permanent change to the item is warranted, process the change in accordance with training procedures.



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**Course SM-01    REQUIRED READING COMPLETION**

Utilize the procedure that is approved during the completion of this attachment. If the document ID has changed due to the changeover to SAFSTOR procedures, document the procedure number used in the individual's qualification guide.

Document Title	Document ID	Trainee Initial/ Date Completed
SONGS Technical Specifications; 3.9 Refueling Operations and 4.3 Fuel Storage/ Permanently Defueled Technical Specifications (whichever is in effect at the time of qualification)	T.S. 3.9 Defueled T.S. 4.3	
SONGS LCS; 8.9 Refueling Operations/ Permanently Defueled Technical Requirements Manual (whichever is in effect at the time of qualification)	SONGS LCS DEFUELED LCS	
Nuclear Fuel Movement – Spent Fuel Pool (Maintenance)	SO23-I-3.53	
Foreign Material Exclusion	SO123-I-1.18	
Scaffolding	SO123-I-1.34	
Industrial Injury, Illness and Near-Miss Reporting and Investigation	SO123-XVI-30	
Safeguards Information	SO123-XV-9 ISS2	
Safe Practices for Storage and Handling of Compressed Gas Cylinders	SO123-XVI-2	
Job Safety Analysis	SO123-XVI-5	
Care and Use of Portable Ladders	SO123-XVI-6	
Personal Protective Equipment	SO123-XVI-7	
Barrier Tape and Barricades	SO123-XVI-13	
Hearing Conservation Program	SO123-XVI-18	
Conduct of Operations	SO123-0-A1	
Operability Determination	SO123-XV-52	
Corrective Action Program	SO123-XV-50, SO123-XV-52, SO123-0-A7	
Human Performance (HU)	SO123-HU-1	
Procedure Use	SO123-0-A3	
Integrated Risk Management	SO23-XX-8	
Hazardous Waste Management Program	SO123-XV-17	
Spill Prevention, Control, and Countermeasures Plan	SO123-XV-16	
Chemical Handling and Storage Guidelines	SO123-XVI-15	
Measuring and Test Equipment Program	SO123-MT-1	
Liquid Radioactive Waste Release Operations	SO23-8-7	
Cranes and Rigging	SO123-I-7.24	
Fuel Handling Accidents / Loss Of Cavity or SFP Level Control	SO23-13-20	
Loss of Spent Fuel Pool Cooling	SO23-13-23	
Radiation Monitoring System	SD-SO23-690	
Station Blackout	SO23-12-8	
24PT4-DSC Dry Cask Storage Loading	SO23-I-30.9, SO23-I-30.9.9, SO23-I-3.53	
24PT4-DSC Dry Cask Storage Unloading	SO23-I-30.9.1	



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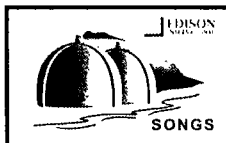
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**Course SM-02<sup>[1]</sup> | CLASSROOM/SELF STUDY COMPLETION FUNDAMENTALS - THEORY**

<b>Lesson Plan Title</b>	<b>Lesson Plan Number<sup>[2]</sup></b>	<b>Trainee Initial/ Date Completed</b>
Thermodynamic Units and Properties	PT01	
Basic Energy Concepts	PT02	
Steam	PT03	
Thermodynamic Processes	PT04	
Fluid Statics and Dynamics	PT06	
Heat Transfer	PT07	
Thermal Hydraulics	PT08	
Valves	PC01	
Pumps	PC02	
Heat Exchangers and Condensers	PC03	
Demineralizers and Ion Exchangers	PC04	
Motors and Generators	PC05	
Breakers, Relays, and Disconnects	PC06	
Sensors/Detectors	PC07	
Controllers and Positioners	PC08	

[1] If previously licensed or GFES previously completed, then Fundamentals – Theory course SM-02 and fundamentals exam may be exempted.

[2] General Physics (GFES) lesson plan number.



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**Course SM-03 CLASSROOM/SELF STUDY COMPLETION FUNDAMENTALS - ADMINISTRATION**

Lesson Plan Title	Lesson Plan Number	Trainee Initial/ Date Completed
Conduct of Operations	2LC705	
Print Reading	OES132	
Procedure Use	2LC820	
Configuration Control	2LC823	
WAR Evaluation	2RP547	
Operation of Annunciators and Indicators	2LC833	
Operator Specific Human Performance Tools	2HU102	
Safety	2LC840	
ODCM & Release Permits	2XRR07	
Notification and Reporting of Significant Events	ORE101	
LOCARs/EDMRs	2LC842	
Chemistry Processes and Procedures	2LC836	
Surveillance Program Requirements	2LC832	
Diagnostics and Problem Solving	2LC843	
HP Instruments and Programs	2LC898	
In-Service Testing	2LC838	
Emergency Plan <sup>[1]</sup>	0RP194	
Notification and Reporting of Significant Events	2ORE101	
Radiation Monitoring System	2XRR08	
Refueling and Fuel Handling Systems	REFSRO	
Technical Specifications	2LC701	
Temporary Facilities Modifications	2LC823	

[1] Prior to approval of the Permanently Defueled Technical Specifications, Technical Requirements Manual/LCS, Offsite Dose Calculations Manual, Fire Protection Program Procedures, and Emergency Plan, utilize the approved Licensed Operator training materials for pre-decommissioning versions of those topics.



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**Course SM-04 CLASSROOM/SELF STUDY COMPLETION FUNDAMENTALS - SYSTEMS**

<b>Lesson Plan Title</b>	<b>Lesson Plan Number</b>	<b>Trainee Initial/ Date Completed</b>
Compressed Air System	2XQ107	
Component Cooling Water System	2XBL01	
Salt Water Cooling System	2XB102	
Circulating Water System	2XP101	
Turbine Plant Cooling Water System	2XP108	
Fuel Storage and Spent Fuel Pool Cooling System	2XBL04	
Emergency Diesel Generators	2XE106, 2XE110, 2XER04, 2XER06	
1E 480v and 4kv Electrical Systems	2XEL03	
Non-1E 480v and 4kv Electrical Systems	2XE102	
1E and Non-1E DC Supply and Distribution Systems	2XE102, 2XEL04, 2XEL05	
Control Room Ventilation	2XVL05	
Control Building Ventilation	2XVL06	
Turbine Building Ventilation System	2XV101	
Radwaste, Penetration and SEB Ventilation Systems	2XVL03	
Containment Ventilation System	2XAL09	
Fuel Handling Building Ventilation	2XVL04	
Compressed Air System	2XQ107	
Fire Protection System	2XF101, 2XFR01	
Gaseous Radwaste System	2XRL06	
Liquid Waste Disposal System	2XRL04, 2XRL05	
Plant Process Computer System	2XCR07	
Station Lighting System	2XE105	
Communications System	2AP104	
Radiation Monitoring System	2XRL07, 2XRR08	
Steam Generator Blowdown Processing System	2XQ101	
Miscellaneous Liquid Waste System	2XLR04	
Miscellaneous Primary Water Systems (Nuclear Service Water and Primary Makeup)	2XL04	
Annunciator System	2XAN01	
Fuel Handling System/ Equipment & Operations	REFSRO	
Shutdown Nuclear Safety	2LC718	
Earthquake	2AO703	





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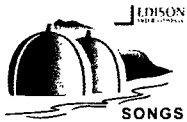
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**Course SM-05**

**CLASSROOM/LABORATORY/CBT COMPLETION NON-OPERATIONS TRAINING**

<b>Lesson Plan Title</b>	<b>Lesson Plan Number</b>	<b>Trainee Initial/ Date Completed</b>
N/A – included for future use		
N/A – included for future use		



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<b>Course SM-06</b>	<b>ON-THE-JOB-TRAINING COMPLETION</b>
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Task Number	Task Title	P/S/D Circle One	Trainer Initials/Date Completed	Evaluator Initials/Date Completed	Matrix Updated DTC Initials/Date
<b>Function: Abnormal &amp; Emergency Operations</b>					
SS-OP-0001	Direct response to an operational radiation monitoring system high radiation alarm	P/S/D			
SS-OP-0002	Direct response to a radiation monitoring system alarm(s)	P/S/D			
SS-OP-0003	Direct response to a Tsunami warning	P/S/D			
SS-OP-0004	Direct the response to a fuel handling accident	P/S/D			
SS-OP-0005	Direct the response to a report that Toxic Gas has been detected	P/S/D			
SS-OP-0006	Direct response to loss of A.C. power	P/S/D			
SS-OP-0007	Direct response to loss of D.C. power	P/S/D			
SS-OP-0008	Direct Fire Alarm Response action	P/S/D			
SS-OP-0009	Direct response to Loss of Plant Annunciators	P/S/D			
SS-OP-0010	Direct the response to Spent Fuel Pool cooling train trouble/loss of level	P/S/D			
SS-OP-0011	Direct the response to an earthquake	P/S/D			
SS-OP-0012	Direct response to and recovery from severe weather	P/S/D			
SS-OP-0013	Direct response to a high sump level	P/S/D			
SS-OP-0014	Direct response to Instrument Air System malfunction	P/S/D			
SS-OP-0015	Coordinate shift personnel actions to ensure plant safety during emergency, abnormal, or off-normal conditions	P/S/D			
SS-OP-0016	Direct the response to a malfunction of the component cooling water system	P/S/D			
SS-OP-0017	Direct response to a loss of saltwater cooling	P/S/D			



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**Course SM-06 ON-THE-JOB-TRAINING COMPLETION**

Task Number	Task Title	P/S/D Circle One	Trainer Initials/Date Completed	Evaluator Initials/Date Completed	Matrix Updated DTC Initials/Date
<b>Function: Containment/Fuel Handling Building Integrity and Access</b>					
SS-OP-0018	Control Containment/Fuel Handling Building access	P/S/D			
<b>Function: Control of Operator Aids</b>					
SS-OP-0019	Review and approve operator aids	P/S/D			
SS-OP-0020	Perform a quarterly audit of operator aids	P/S/D			
<b>Function: Control of System Alignments</b>					
SS-OP-0021	Initiate, review and approve an abnormal alignment/evolution	P/S/D			
<b>Function: Control Room Access and Conduct</b>					
SS-OP-0022	Assume the control room command function	P/S/D			
SS-OP-0023	Maintain professional conduct and atmosphere in the Control Room and outside plant areas	P/S/D			
<b>Function: Distribution and Acknowledgement of Information</b>					
SS-OP-0024	Complete required Acknowledgement of Information items	P/S/D			
<b>Function: Duties and Responsibilities</b>					
SS-OP-0025	Perform personnel administrative duties	P/S/D			
SS-OP-0026	Supervise all fuel handling operations	P/S/D			
SS-OP-0027	Exercise the ultimate command decision authority over all plant activities and operations	P/S/D			
SS-OP-0028	Perform a plant inspection tour	P/S/D			
SS-OP-0029	Stop or defer any plant modification, test, engineering or maintenance activity which could jeopardize safe operation	P/S/D			
SS-OP-0030	Direct operator action to any unanticipated changes to plant status	P/S/D			
SS-OP-0031	Consider ALARA when assigning jobs to operators	P/S/D			



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Task Number	Task Title	P/S/D Circle One	Trainer Initials/Date Completed	Evaluator Initials/Date Completed	Matrix Updated DTC Initials/Date
<b>Function: Duties and Responsibilities (Continued)</b>					
SS-OP-0032	Approve re-energizing a 480V circuit after an overcurrent trip	P/S/D			
SS-OP-0033	Provide training, coaching and counseling to shift personnel	P/S/D			
SS-OP-0034	Coordinate site security activities	P/S/D			
SS-OP-0035	Assist in the administration of the labor agreement	P/S/D			
SS-OP-0036	Supervise shift training activities	P/S/D			
SS-OP-0037	Coordinate activities during a fire or rescue inside the protected area	P/S/D			
SS-OP-0038	Determine non-conformance report operability and reportability requirements	P/S/D			
SS-OP-0039	Direct shift personnel actions to ensure plant safety during emergency, abnormal, or off-normal conditions	P/S/D			
SS-OP-0040	Determine if a local area evacuation is required	P/S/D			
SS-OP-0041	Recommend reclassification if plant conditions allow reclassification of an emergency event	P/S/D			
SS-OP-0042	Determine if plant conditions allow closeout of an emergency event	P/S/D			
SS-OP-0043	Perform the duties of the EC during an emergency event	P/S/D			
SS-OP-0044	Coordinate emergency response activities during implementation of the emergency plan	P/S/D			
SS-OP-0045	Recommend classification of emergency events requiring emergency plan implementation	P/S/D			
SS-OP-0046	Approve license deviation	P/S/D			
SS-OP-0047	Perform emergency plan recovery actions	P/S/D			
SS-OP-0048	Recommend activation of the emergency plan	P/S/D			
SS-OP-0049	Perform emergency plan recovery actions	P/S/D			



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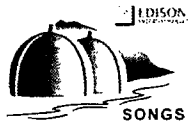
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Task Number	Task Title	P/S/D Circle One	Trainer Initials/Date Completed	Evaluator Initials/Date Completed	Matrix Updated DTC Initials/Date
<b>Function: General Administrative Requirements</b>					
SS-OP-0050	Establish priorities for shift activities	P/S/D			
SS-OP-0051	Acknowledge and evaluate chemistry analysis	P/S/D			
SS-OP-0052	Review and approve waste discharge/release permits	P/S/D			
SS-OP-0053	Approve interim control/alarm setpoint changes	P/S/D			
SS-OP-0054	Direct the establishment of plant conditions to support maintenance activities	P/S/D			
SS-OP-0055	Monitor plant activities and operations	P/S/D			
SS-OP-0056	Plan and direct plant activities	P/S/D			
SS-OP-0057	Ensure all precautions and personnel safety aspects are considered prior to starting a job	P/S/D			
SS-OP-0058	Ensure RP, Security, and Safety work practices are followed	P/S/D			
SS-OP-0059	Review / Approve safety related system and component control forms	P/S/D			
SS-OP-0060	Conduct tailboard meetings to preplan plant activities	P/S/D			
SS-OP-0061	Assess system operability/functionality prior to, during and after valve packing repair	P/S/D			
SS-OP-0062	Maintain custody of controlled keys	P/S/D			
SS-OP-0063	Perform local accident investigations	P/S/D			
SS-OP-0064	Manage the shift team	P/S/D			
SS-OP-0065	Direct the retention and disposition of records generated by the operations division	P/S/D			
SS-OP-0066	Assist in revising and review of procedures	P/S/D			
SS-OP-0067	Assess shift personnel for fitness for duty	P/S/D			
SS-OP-0068	Evaluate the effectiveness of the shift turnover process	P/S/D			
SS-OP-0069	Perform shift relief turnover activities	P/S/D			



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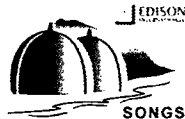
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Task Number	Task Title	P/S/D Circle One	Trainer Initials/Date Completed	Evaluator Initials/Date Completed	Matrix Updated DTC Initials/Date
<b>Function: Operations Standards</b>					
SS-OP-0070	Coordinate on-shift team activities	P/S/D			
SS-OP-0071	Ensure/oversee on-shift team compliance	P/S/D			
SS-OP-0072	Ensure Supervisory Communication Standards are maintained	P/S/D			
<b>Function: Integrated Plant Operations</b>					
SS-OP-0073	Evaluate plant conditions with respect to NPDES requirements	P/S/D			
SS-OP-0074	Notify the Shift Supervisor or Environmental Engineering upon failure of environmental monitoring instrumentation	P/S/D			
<b>Function: Notification and Reporting of Significant Events</b>					
SS-OP-0075	Report significant events to the nuclear regulatory commission / Initiate an Event Report per SO123-0-A8 Notifications	P/S/D			
SS-OP-0076	Make notifications to Plant Management	P/S/D			
SS-OP-0077	Make notifications to other departments	P/S/D			
<b>Function: Operations Surveillance Implementation</b>					
SS-OP-0078	Authorize, supervise and review all surveillance tests performed on shift	P/S/D			
<b>Function: Operations Shift Relief</b>					
SS-OP-0079	Evaluate the effectiveness of the shift turnover process	P/S/D			
<b>Function: Radiation Monitoring System</b>					
SS-OP-0080	Approve radiation monitor setpoint changes	P/S/D			
<b>Function: Refueling and Fuel Handling Systems</b>					
SS-OP-0081	Perform the duties of Certified Fuel Handler during fuel handling operations	P/S/D			



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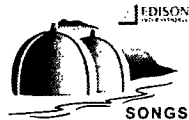
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Task Number	Task Title	P/S/D Circle One	Trainer Initials/Date Completed	Evaluator Initials/Date Completed	Matrix Updated DTC Initials/Date
<b>Function: Technical Specifications</b>					
SS-OP-0082	Evaluate plant status against technical specification and other regulatory requirements	P/S/D			
SS-OP-0083	Ensure compliance with Technical Specifications and other regulatory requirements	P/S/D			
SS-OP-0084	Initiate and complete a Limiting Condition for Operation Action Requirement or EDMR	P/S/D			
SS-OP-0085	Close out a Limiting Condition for Operation Action Requirement or EDMR	P/S/D			
SS-OP-0086	Review and approve compensatory actions for inoperable annunciators	P/S/D			
SS-OP-0087	Perform a review of active LCOAR's or EDMR's	P/S/D			
<b>Function: Temporary Facilities Modification</b>					
SS-OP-0088	Evaluate the completion of temporary modification control forms prior to installing or removing a temporary modification	P/S/D			
SS-OP-0089	Declare equipment or system operable/functional after testing and removal of caution tags	P/S/D			
SS-OP-0090	Coordinate shift activities for the installation and removal of temporary modifications	P/S/D			
<b>Function: Use of Procedures</b>					
SS-OP-0091	Initiate procedure changes to conduct plant evolutions	P/S/D			
SS-OP-0092	Maintain the "Procedures In Use" binder	P/S/D			
SS-OP-0093	Direct shift personnel during abnormal/emergency situations not covered by procedure	P/S/D			



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Task Number	Task Title	P/S/D Circle One	Trainer Initials/Date Completed	Evaluator Initials/Date Completed	Matrix Updated DTC Initials/Date
<b>Function: Work Authorizations</b>					
SS-OP-0094	Direct shift personnel to remove equipment from service for maintenance	P/S/D			
SS-OP-0095	Review / Approve the modification of a clearance or a permission	P/S/D			
SS-OP-0096	Approve the installation and removal of caution tags	P/S/D			
SS-OP-0097	Ensure test required tags hung	P/S/D			
SS-OP-0098	Review and approve work authorization forms	P/S/D			
SS-OP-0099	Direct minor repairs by the operating shift	P/S/D			
SS-OP-0100	Review and approve the implementation of plant design changes	P/S/D			
SS-OP-0101	Authorize release from / return to service of important to safety systems for maintenance or testing	P/S/D			
SS-OP-0102	Prepare a work authorization record tagout	P/S/D			
SS-OP-0103	Initiate plant saving/damage control actions	P/S/D			
SS-OP-0104	Manage the control of equipment status	P/S/D			



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**Discuss the following with a qualified SM/CFH:**

**Application of Observation Skills**

1. Discuss the fitness for duty program and the supervisor's responsibility for implementing the program including:
  - Techniques for observing behavior
  - Corporate alcohol and drug policy
  - Fitness for duty documentation requirements
  - Requirements to have another supervisor observe a potential fitness for duty situation
  - Fitness for duty situations involving matrixed personnel
  - Actions to take if an individual is suspected to be under the influence of drugs or alcohol
  - Action required if an individual is determined to be unfit to perform his/her duties in a safe and efficient manner
  - Rights of the individual to union representation
  - Counseling techniques for fitness for duty situations
  - Potential disciplinary action that could result from a fitness for duty situation
  - Termination/Change of Status Notification Form
  - Test Consent and Release of Medical Information Form
  - Requirement to notify labor relations per SO123-0-A1 and SO123-XV-6.

\_\_\_\_\_  
Qualified SM/CFH (signature)

\_\_\_\_\_  
Date

**Corrective Action Program**

1. Describe the NN process and the Shift Manager's role in this process including:
  - Purpose of the NN program
  - Purpose, arrangement and use of the NN form
  - Making NN operability and reportability determinations
  - Compensatory action required when restricted operability exists on a component required to be in operation
  - Responsibility of NN Review Committee
  - Restoration of operable status in NN system per SO123-XV-52.

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2. Determine NN operability and reportability requirements per SO123-XV-52 and SO123-0-A7.

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**Safe Storage Shift Manager / Certified Fuel Handler  
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**Attachment 3**

**Industrial Safety and ALARA**

1. Review how the SCE safety program is implemented through the following components:

- Personnel input/action
- Industrial accident reporting/investigation per SO123-XVI-30
- Occupational Safety and Health per SO123-XXI-14
- SONGS Workplace Safety inspections per SO123-XVI-19
- Occupational Safety and Health Program per SO123-IS-1
- Accident prevention rules, policies, and safe work practices
- Site Web Page – Occupational Safety and Health (OSH)

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2. Discuss the responsibility of the Shift Manager for radiation protection and ALARA including:

- Station and federal radiation exposure guidelines
- Requirements of the ALARA program
- Factors to be considered when assigning tasks involving radiation exposure
- Means available to estimate radiation exposure for a task per SO123-VII-20.10, Radiological Work Planning and Controls

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**Attachment 3**

**Station Security**

1. Discuss the responsibility of the Shift Manager for station security including:
  - Authority and responsibility of the Shift Manager for plant security
  - Purpose, requirements and authority of the SONGS Physical Security Plan
  - Purpose of the Safeguards Contingency Plan
  - Requirements for access and protection of safeguards information
  - Notification requirements if an unusual condition or activity concerning security is identified
  - Means available for the Shift Manager to notify security
  - Definition of sabotage
  - Action required if a bomb threat is received
  - Prohibited items that require notification of security if discovered
  - Action required if a security concern is reported to the Shift Manager
  - Action required if there is evidence or signs of tampering, manipulation, damage, or destruction of Vital Area equipment
  - Requirement for security to notify the Shift Manager when a posted watertight hatch is open and there is a possibility of flood conditions per S0123-XV-24, and SO123-IV-Series (3.100, 4.4, 5.1, 5.1.3, 5.3.5, 5.4, 6.8.5, 7.1, 9.6, 11.2).

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**Attachment 3**

**Operating Philosophy**

1. Discuss the responsibility of the Shift Manager to exercise the ultimate command decision authority over all plant activities and operations on the Unit(s) which affect the safety of the plant, Site personnel and/or the general public including:
- Authority to act as senior plant management representative
  - Requirement to maintain a broad/comprehensive perspective of plant activities
  - Authority to order an immediate cessation of any activity which is detrimental to safe and efficient operation
  - Authority to order the placement of systems in a safe condition
  - Responsibilities that can be delegated to other crew members
  - Authority to direct/coordinate all site resources
  - Operations that require the approval of the Shift Manager per SO23-0-A1 and Nuclear Organization Directive D-004.

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2. Discuss the responsibility of the Shift Manager for monitoring plant operations and activities including:
- Requirements for plant inspection tours
  - Techniques for observing personnel performance
  - Indications that should be monitored to maintain an overall perspective of plant operations
  - Techniques for evaluating the material conditions of plant systems and equipment per SO123-0-A1, SO123-0-A2, OSM-5, and OSM 14

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3. Discuss the responsibility of the Shift Manager to initiate a pre-job brief prior to performing shift evolutions including:
- Conditions that require a pre-job brief
  - Personnel that should be involved in the pre-job brief
  - Good operating practices associated with a pre-job brief per SO123-XX-5, SO123-0-A1, OSM 6, and SO123-HU-2.

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**Attachment 3**

**Operating Philosophy (Continued)**

4. Using a station organizational chart, describe the function of each department at SONGS, how each department interfaces with Operations, and the normal and emergency lines of communication per the Nuclear Organization Jurisdiction Statements (NO-JS-1).

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5. Discuss the responsibility of the Shift Manager to implement housekeeping on-site including:

- Inspecting Zones I-V
- Reporting and Resolving Housekeeping Discrepancies
- Cleaning and disposing of trash
- Foreign Material Exclusion Program per SO123-HK-1, SO123-0-A1, SO123-0-A2 and SO123-I-1.18.

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6. Discuss the responsibility of the Shift Manager for control room access and conduct including:

- Standards for control room area conduct and professional behavior
- Site organizations that can provide status information other than shift operators
- Control room access during shift relief per SO123-0-A1, SO123-0-A2, OSM-14, and associated Weblinks

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7. Discuss the process and requirements for the Shift Manager to evaluate the shift turnover process including:

- Requirements for shift relief status sheet entries
- Documentation of shift relief evaluation per SO123-0-A1 and associated Weblinks.

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**Attachment 3**

**Operating Philosophy (Continued)**

8. Discuss the responsibility of the Shift Manager to initiate actions while under conditions outlined in the Technical Specifications including:

- Definition of "Initiation Time"
- Requirement to take positive and expeditious steps to restore equipment operability when operating under a technical specification action requirement

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9. Discuss the purpose and authority of the following documents and how the Shift Manager uses these documents to manage shift operations during normal and emergency conditions:

- NUREGs
- Design Basis Documents
- Final Safety Analysis Report
- NPDES Permit
- Facility License
- Chapter 10 Code of Federal Regulations

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**Interpersonal Skills**

1. Discuss the responsibility of the Shift Manager to assist in the administration of the labor agreement including:

- Oral grievance process
- Written grievance process
- Responsibilities of the union steward per SO123-0-A2.

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**Attachment 3**

**Plant Modifications, Temporary Modifications and System Alterations**

1. Discuss managing the control of equipment status per SO123-XX-5.

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2. Review the Shift Manager's responsibility and response to a report of a system misalignment including:

- Evaluation of equipment operability
- Evaluation of technical specification impact
- Actions required if there is evidence of or suspicion of tampering.
- Action required for discovery of plant misalignment
- Action required if misalignment is due to unauthorized positioning of components
- Factors to consider to determine corrective action requirements
- Factors to consider when determining if continued operation is possible per SO123-0-A4, SO123-0-A7, SO23-XV-15, and Web links A4-01 thru A4-06.

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3. Discuss the responsibility of the Shift Manager for approving any operation of PTs and CTs that deviates from prior approved procedures including requirements of System Operating Bulletins for operating PT and CT secondary switches as critical components.

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Date

4. Discuss the responsibility of the Shift Manager to approve testing of 480 VAC feeders after a relay operation including:

- Determining operational impact of continued operation without the tripped component
- Requirements to prepare/document plans to reenergize the tripped component
- Factors to be considered to determine if tripped components should be reenergized per SO123-0-A1/SO123-0-A2.

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**Attachment 3**

**Plant Modifications, Temporary Modifications and System Alterations (Continued)**

5. Describe the temporary modification process and the Shift Manager's role in this process, including:

- Purpose of a temporary ECP
- Conditions where a temporary ECP would be used
- Purpose, arrangement and use of the temporary ECP
- Definition of control point
- Documentation requirement for installation and removal
- Operability testing requirements
- Requirements for generating a LCOAR/EDMR
- Evaluation of plant/technical specification impact per SO123-XV-5.1

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6. From memory, discuss the concept of configuration control and the Shift Manager's role in this process per SO123-CC-2.

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**Attachment 3**

**Procedure Changes**

1. Review the requirements and responsibility of the Shift Manager for making procedure changes including:

- Factors to be considered before approving a procedure change
- Technical specification requirements for procedure changes
- Preparation, review and approval process for a procedure modification permit
- Preparation, review and approval process for a temporary change notice
- Use of telecom approvals per SO123-0-A3, and SO13-0-A7.

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2. Review the requirements and responsibility of the Shift Manager for use of procedures during normal, abnormal and emergency conditions including:

- Evolutions where the use of procedures is required
- Action required if the procedure intent or detail is inappropriate for the evolution being performed
- Action required when a procedure does not exist and is not required
- Requirements for having procedure in-hand when performing an evolution
- Conditions that would require a special test procedure
- Methods for implementing AOIs and EOIs
- Relative priority of normal operating instructions, AOIs and EOIs
- Good operating practices associated with the use of procedures
- Management philosophy regarding the use of procedures
- Requirements for a pre-job brief before implementation of a procedure
- Action required if an AOI step cannot be completed due to plant conditions per SO123-0-A3, SO123-0-A1 and associated Weblinks.

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3. Discuss the Shift Manager's authority to approve additional actions required to be taken during emergencies which are not covered by the Emergency Operating Instructions including:

- Factors to be considered before authorizing deviation from procedures during an emergency
- Management philosophy concerning taking action during emergencies which are not covered by EOPs
- Conditions which may require taking action during emergencies which are not covered by EOPs
- Requirements of ANSI N18.7-1976, Section 5.2.2 per SO123-0-A1, SO123-0-A2, and associated Weblinks.

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**Attachment 3**

**Supervisory Counseling**

1. Discuss the responsibilities for ensuring shift personnel review acknowledgement of information material in a timely manner per SO123-0-A2.

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2. Discuss the responsibility of the Shift Manager for implementation of the Professional Operator's Development including:

- Operator evaluations through Performance Appraisal/Performance Partnership Agreement
- Barriers to good operating practices
- Supervisory good practices per the Human Performance procedures, OSM-6, SO123-0-A2.

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3. Discuss the responsibility of the Shift Manager to manage overtime for operations personnel including:

- Authorizing Overtime
- Applying Technical Specification guidance
- Applying NRC guidelines
- Applying SONGS guidelines
- Applying the labor agreement guidelines per the ESM, OSM-7

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4. Discuss the techniques and responsibility of the Shift Manager for counseling operations personnel including:

- Communicating expectations
- Maintaining a fair and unbiased approach
- Coaching techniques
- Providing performance feedback per the Operator Performance Standards

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**Supervisory Counseling (Continued)**

5. Discuss the techniques and responsibility of the Shift Manager for coaching Operations personnel including:

- Coaching techniques
- Using coaching to improve teamwork
- Using coaching to boost morale or confidence
- Using coaching to foster increased participation of team members
- Using coaching to encourage professional behavior per the Operator Performance Standards

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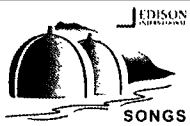
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6. Discuss the process and responsibility of the Shift Manager for operator performance evaluations per the Operator Performance Appraisal Guidelines, including:

- Requirements and techniques for recording employee work practices
- Operator Areas of Responsibility and Performance Standards
- Preparing the Employee Performance Development Plan form
- Using performance appraisals to improve Operator professionalism
- Techniques for performing performance appraisal interviews
- Requirements for confidentiality
- Definitions of performance ratings
- Potential problems that may result from performance appraisals
- Determining development needs from performance appraisals
- Performance appraisal review and approval process

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**Supervisory Counseling (Continued)**

7. Discuss the techniques and responsibility of the Shift Manager for evaluating and correcting a performance problem including:

- Techniques for administering discipline
- Possible causes of degraded work performance
- Establishing performance goals
- Establishing performance improvement plans
- SCE discipline policy
- Operator performance standards
- Basis for Operator performance standards
- Resolving conflict
- Situations that may require involvement or intervention by managers above the Shift Superintendent
- Apply the Union Contract per SO123-0-A2 associated Weblinks (A202), and ESM.

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8. Discuss the management principles and techniques associated with the following:

- Developing teamwork
- Motivating personnel
- Conservative decision making
- Delegating
- Command & Control

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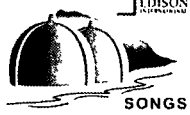
**Attachment 3**

**Non Routine Reporting Requirements**

1. Discuss the responsibility of the Shift Manager for notification and reporting of significant events to the NRC including:
  - Management philosophy regarding notification of significant events
  - Requirements of 10CFR10.72(b)(1)
  - Events that require immediate 1 hour notification to the NRC
  - Events that require 4 hour notification to the NRC
  - Events that require 8 hour notification to the NRC
  - Events that require 24 hour notification to the NRC
  - Events that require notifying the NRC Resident (s).
  - Requirements to notify station management when notification to the NRC is made
  - Requirements for follow-up notification
  - Events that require written notification to the NRC
  - Documentation requirements
  - Conditions when ESF actuations are not reportable per SO123-0-A7

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**Emergency Operations**

1. Discuss the Shift Manager's responsibility and techniques for managing shift activities during emergency conditions including:

- Maintaining and demonstrating overall management authority
- Focusing on spent fuel pool safety as the overriding concern
- Keeping public and plant personnel safety as the first priority
- Following chain of command
- Consulting/notifying plant management
- Use of good operating practices
- Maintaining compliance and the appearance of compliance
- Taking a conservative approach
- Required announcements
- Documentation requirements
- Overriding a safety system

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2. Describe the Emergency Response Organization and its interface with the Emergency Coordinator/Shift Manager during Emergency Plan Implementation per SO123-VIII-10.

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Date

3. Discuss the authority of the Shift Manager/Emergency Coordinator to authorize actions which would intentionally deviate from license conditions or Technical Specifications including:

- Conditions where a deviation from licensed conditions or Technical Specifications may be authorized
- Notification requirements per SO23-0-A7, SO123-0-A8 and SO123-VIII-10

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**Attachment 3**

**Support of Training**

1. Discuss the responsibility of the Shift Manager for Operator development and training including:

- On-the-job training
- Employee Assistance Program
- M&SD Program
- Training Program Requirements per SO23-XXI-TRN, SO123-0-A1, and SO123-0-A2

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2. Discuss the elements of a systematic approach to training per 10CFR50.120 and SO23-XXI-TRN.

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Date



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**Attachment 3**

**Work Controls**

1. Discuss the management principles and techniques associated with planning and scheduling work, including:

- Resource management - outage/non-outage
- Resource scheduling
- Long term vs. short term planning
- OSM-7

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Date

2. Discuss the techniques and responsibility of the Shift Manager for developing a plan for completing the shift's activities including:

- Factors considered when prioritizing shift activities
- Use and authority of the Daily Activity Planner
- Use and authority of special orders
- Techniques for identifying potential problems and developing contingency plans
- When and how to use feedback from the shift or management
- Resolving conflicting plans or priorities
- Sources of information available
- Management philosophy towards planning shift activities
- Concept and use of "stop criteria"
- Evaluating plans against available resources
- Evaluating how shift activities will affect long range plans
- Evaluating cost/benefit when setting goals for the shift per OSM-6, SO123-0-A2, SO123-0-A1, and the Human Performance Handbook

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**Work Controls (Continued)**

3. Discuss the responsibility of the Shift Manager to initiate action associated with equipment deficiencies including:

- Safety hazards
- Minor maintenance
- Plant Saving/Damage Control Action
- Shift Managers Accelerated Maintenance per SO123-XX-5

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4. Discuss the responsibility of the Shift Manager to implement equipment control testing requirements including:

- Functional tests
- Post maintenance tests
- Operability tests
- Maintenance retest program per SO123-XX-5

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Date



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**Record of Completion for Shift Manager/ Certified Fuel Handler  
Under-Instruction Watch  
(3 watches SHALL be during day shift)**

<b>SM/CFH Under Instruction Watch on Shift</b>		<b>Print/Signature/Date</b>
Watch #1	_____ Shift(Day/Night)/Jobs/Tasks completed on watch	_____ Shift Manager
Watch #2	_____ Shift(Day/Night)/Jobs/Tasks completed on watch	_____ Shift Manager
Watch #3	_____ Shift(Day/Night)/Jobs/Tasks completed on watch	_____ Shift Manager
Watch #4	_____ Shift(Day/Night)/Jobs/Tasks completed on watch	_____ Shift Manager
Watch #5	_____ Shift(Day/Night)/Jobs/Tasks completed on watch	_____ Shift Manager



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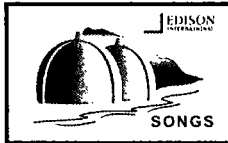
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**Attachment 3**

**Qualification Requirements Checklist**

<b>Section Completed</b>	<b>DTC Initials</b>	<b>Date</b>
Course SM-01 – Required Reading	_____	_____
Course SM-02 – Fundamentals - Theory	_____	_____
Course SM-03 – Fundamentals - Administration	_____	_____
Course SM-04 – Fundamentals - Systems	_____	_____
Fundamentals Comprehensive Examination	_____	_____
Course SM-05 – Non-Operations Training	_____	_____
Course SM-06 – On-the-job Training	_____	_____
Emergency Coordinator Qualification (Encode 72AQWT)	_____	_____
Under-Instruction Watches	_____	_____
Oral Board	_____	_____
Comprehensive Written Exam	_____	_____
Operating Exam	_____	_____



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**Attachment 3**

**Qualification Documentation**

1. All training requirements are completed for the position of SM/CFH as documented on the qualification requirements checklist.

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DTC Printed Name and Signature

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Date

2. I approve qualification of the trainee to perform all duties as SM/CFH.

\_\_\_\_\_

Manager, Operations (or designee) Printed Name and Signature

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Date

3. Department qualification matrix has been updated.

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Date

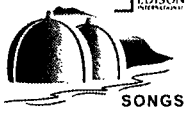
4. All appropriate records have been sent to Records Management.

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DTC Printed Name and Signature

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Date



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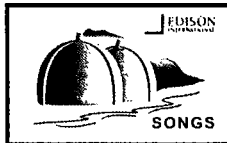
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Lesson Plan Information

**Attachment 4**

**ON-THE-JOB-TRAINING COMPLETION**

<b>Task Number</b>	<b>Task Title</b>	<b>Lesson Plan Info</b>
<b>Function: Abnormal &amp; Emergency Operations</b>		
SS-OP-0001	Direct response to an operational radiation monitoring system high radiation alarm	2XRR08
SS-OP-0002	Direct response to a radiation monitoring system alarm(s)	2XRR08
SS-OP-0003	Direct response to a Tsunami warning	2AO728
SS-OP-0004	Direct the response to a fuel handling accident	2AO720
SS-OP-0005	Direct the response to a report that Toxic Gas has been detected	2AO702
SS-OP-0006	Direct response to loss of A.C. power	2AO726
SS-OP-0007	Direct response to loss of D.C. power	2AO718
SS-OP-0008	Direct Fire Alarm Response action	2AO721
SS-OP-0009	Direct response to Loss of Plant Annunciators	2AO722
SS-OP-0010	Direct the response to Spent Fuel Pool cooling train trouble/loss of level	2AO723
SS-OP-0011	Direct the response to an earthquake	2AO703
SS-OP-0012	Direct response to and recovery from severe weather	2AO728
SS-OP-0013	Direct response to a high sump level	2XRL05
SS-OP-0014	Direct response to Instrument Air System malfunction	2AO705
SS-OP-0015	Coordinate shift personnel actions to ensure plant safety during emergency, abnormal, or off-normal conditions	
SS-OP-0016	Direct the response to a malfunction of the component cooling water system	2AO707
SS-OP-0017	Direct response to a loss of saltwater cooling	2AO707
<b>Function: Containment/Fuel Handling Building Integrity and Access</b>		
SS-OP-0018	Control Containment/Fuel Handling Building access	2LS701
<b>Function: Control of Operator Aids</b>		
SS-OP-0019	Review and approve operator aids	2LC705, 2LC823
SS-OP-0020	Perform a quarterly audit of operator aids	2LC705, 2LC823
<b>Function: Control of System Alignments</b>		
SS-OP-0021	Initiate, review and approve an abnormal alignment/evolution	2LC705, 2LC823
<b>Function: Control Room Access and Conduct</b>		
SS-OP-0022	Assume the control room command function	2LC705
SS-OP-0023	Maintain professional conduct and atmosphere in the Control Room and outside plant areas	2LC705
<b>Function: Distribution and Acknowledgement of Information</b>		
SS-OP-0024	Complete required Acknowledgement of Information items	2LC705



**Safe Storage Shift Manager / Certified Fuel Handler  
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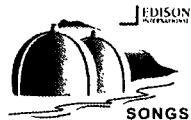
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**Attachment 4**

**ON-THE-JOB-TRAINING COMPLETION**

<b>Task Number</b>	<b>Task Title</b>	<b>Lesson Plan Info</b>
<b>Function: Duties and Responsibilities</b>		
SS-OP-0025	Perform personnel administrative duties	2LC705
SS-OP-0026	Supervise all fuel handling operations	2XBL05, 2XBL04, REFSRO
SS-OP-0027	Exercise the ultimate command decision authority over all plant activities and operations	2LC705, 2SST00
SS-OP-0028	Perform a plant inspection tour	2LC705
SS-OP-0029	Stop or defer any plant modification, test, engineering or maintenance activity which could jeopardize safe operation	2WC100
SS-OP-0030	Direct operator action to any unanticipated changes to plant status	2LC823
SS-OP-0031	Consider ALARA when assigning jobs to operators	2LC898
SS-OP-0032	Approve re-energizing a 480V circuit after an overcurrent trip	2WC100
SS-OP-0033	Provide training, coaching and counseling to shift personnel	2LC705
SS-OP-0034	Coordinate site security activities	2LC705
SS-OP-0035	Assist in the administration of the labor agreement	2LC705
SS-OP-0036	Supervise shift training activities	2LC705
SS-OP-0037	Coordinate activities during a fire or rescue inside the protected area	2AO721
SS-OP-0038	Determine non-conformance report operability and reportability requirements	S59017
SS-OP-0039	Direct shift personnel actions to ensure plant safety during emergency, abnormal, or off-normal conditions	2LC705
SS-OP-0040	Determine if a local area evacuation is required	SO23-13-1
SS-OP-0041	Recommend reclassification if plant conditions allow reclassification of an emergency event	0RP194
SS-OP-0042	Determine if plant conditions allow closeout of an emergency event	0RP194
SS-OP-0043	Perform the duties of the EC during an emergency event	0RP194
SS-OP-0044	Coordinate emergency response activities during implementation of the emergency plan	0RP194
SS-OP-0045	Recommend classification of emergency events requiring emergency plan implementation	0RP194
SS-OP-0046	Approve license deviation	2LC722
SS-OP-0047	Perform emergency plan recovery actions	0RP194
SS-OP-0048	Recommend activation of the emergency plan	0RP194
SS-OP-0049	Perform emergency plan recovery actions	0RP194



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**Attachment 4**

**ON-THE-JOB-TRAINING COMPLETION**

<b>Task Number</b>	<b>Task Title</b>	<b>Lesson Plan Info</b>
<b>Function: General Administrative Requirements</b>		
SS-OP-0050	Establish priorities for shift activities	2LC705
SS-OP-0051	Acknowledge and evaluate chemistry analysis	2LC836
SS-OP-0052	Review and approve waste discharge/release permits	2XRR07
SS-OP-0053	Approve interim control/alarm setpoint changes	2LC833
SS-OP-0054	Direct the establishment of plant conditions to support maintenance activities	2WC100
SS-OP-0055	Monitor plant activities and operations	2LC705
SS-OP-0056	Plan and direct plant activities	2LC705
SS-OP-0057	Ensure all precautions and personnel safety aspects are considered prior to starting a job	2LC705
SS-OP-0058	Ensure RP, Security, and Safety work practices are followed	2WC100
SS-OP-0059	Review / Approve safety related system and component control forms	2LC823
SS-OP-0060	Conduct tailboard meetings to preplan plant activities	2LC705
SS-OP-0061	Assess system operability/functionality prior to, during and after valve packing repair	2WC100
SS-OP-0062	Maintain custody of controlled keys	2LC705
SS-OP-0063	Perform local accident investigations	2LC705
SS-OP-0064	Manage the shift team	2LC705
SS-OP-0065	Direct the retention and disposition of records generated by the operations division	2LC705
SS-OP-0066	Assist in revising and review of procedures	2LC820
SS-OP-0067	Assess shift personnel for fitness for duty	2LC705
SS-OP-0068	Evaluate the effectiveness of the shift turnover process	2LC705
SS-OP-0069	Perform shift relief turnover activities	2LC705
<b>Function: Operations Standards</b>		
SS-OP-0070	Coordinate on-shift team activities	2LC705
SS-OP-0071	Ensure/oversee on-shift team compliance	2LC705
SS-OP-0072	Ensure Supervisory Communication Standards are maintained	2LC705
<b>Function: Integrated Plant Operations</b>		
SS-OP-0073	Evaluate plant conditions with respect to NPDES requirements	2XRR07
SS-OP-0074	Notify the Shift Supervisor or Environmental Engineering upon failure of environmental monitoring instrumentation	2RP544



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**ON-THE-JOB-TRAINING COMPLETION**

<b>Task Number</b>	<b>Task Title</b>	<b>Lesson Plan Info</b>
<b>Function: Notification and Reporting of Significant Events</b>		
SS-OP-0075	Report significant events to the nuclear regulatory commission / Initiate an Event Report per SO123-0-A8 Notifications	0RP194, ORE101
SS-OP-0076	Make notifications to Plant Management	0RP194, ORE101
SS-OP-0077	Make notifications to other departments	0RP194, ORE101
<b>Function: Operations Surveillance Implementation</b>		
SS-OP-0078	Authorize, supervise and review all surveillance tests performed on shift	2WC100
<b>Function: Operations Shift Relief</b>		
SS-OP-0079	Evaluate the effectiveness of the shift turnover process	2LC705
<b>Function: Radiation Monitoring System</b>		
SS-OP-0080	Approve radiation monitor setpoint changes	2LC823
<b>Function: Refueling and Fuel Handling Systems</b>		
SS-OP-0081	Perform the duties of Certified Fuel Handler during fuel handling operations	REFSRO
<b>Function: Technical Specifications</b>		
SS-OP-0082	Evaluate plant status against technical specification and other regulatory requirements	2LC842
SS-OP-0083	Ensure compliance with Technical Specifications and other regulatory requirements	2LC701
SS-OP-0084	Initiate and complete a Limiting Condition for Operation Action Requirement or EDMR	2LC842
SS-OP-0085	Close out a Limiting Condition for Operation Action Requirement or EDMR	2LC842
SS-OP-0086	Review and approve compensatory actions for inoperable annunciators	2LC823
SS-OP-0087	Perform a review of active LCOAR's or EDMR's	2LC842
<b>Function: Temporary Facilities Modification</b>		
SS-OP-0088	Evaluate the completion of temporary modification control forms prior to installing or removing a temporary modification	2WC100
SS-OP-0089	Declare equipment or system operable/functional after testing and removal of caution tags	S50701
SS-OP-0090	Coordinate shift activities for the installation and removal of temporary modifications	2LC705
<b>Function: Use of Procedures</b>		
SS-OP-0091	Initiate procedure changes to conduct plant evolutions	2LC820
SS-OP-0092	Maintain the "Procedures In Use" binder	2LC820
SS-OP-0093	Direct shift personnel during abnormal/emergency situations not covered by procedure	2LC705



**Safe Storage Shift Manager / Certified Fuel Handler  
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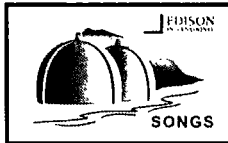
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**Attachment 4**

**ON-THE-JOB-TRAINING COMPLETION**

<b>Task Number</b>	<b>Task Title</b>	<b>Lesson Plan Info</b>
<b>Function: Work Authorizations</b>		
SS-OP-0094	Direct shift personnel to remove equipment from service for maintenance	2WC100
SS-OP-0095	Review / Approve the modification of a clearance or a permission	2WC100
SS-OP-0096	Approve the installation and removal of caution tags	2WC100
SS-OP-0097	Ensure test required tags hung	2WC100
SS-OP-0098	Review and approve work authorization forms	2LC705, 2WC100
SS-OP-0099	Direct minor repairs by the operating shift	2LC705, 2WC100
SS-OP-0100	Review and approve the implementation of plant design changes	2WC100
SS-OP-0101	Authorize release from / return to service of important to safety systems for maintenance or testing	2WC100
SS-OP-0102	Prepare a work authorization record tagout	2WC100
SS-OP-0103	Initiate plant saving/damage control actions	2RP544
SS-OP-0104	Manage the control of equipment status	2WC100



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Summary of Changes

Attachment 5

Author: Lauren Kent PAX: 83884 Location: E50

NN, Order, or Other Action	Description of Change	Step, Section, Attachment or Page
NN 202485124	New procedure due to SONGS decommissioning	ALL
SO123-XV-HU-3	Determine document's Level of Use (Information Use)	ALL
SO123-XV-91	Determine document's Reactivity Management implementation (RX-DNA)	ALL
50.59 and 72.48 Screen	Determination of 50.59 (DNA)	ALL
	Determination of 72.48 (DNA)	ALL

DOCUMENT REVIEWERS	ORGANIZATION
Lynn Florey	NTD – Cog Sup
George Pickar	NTD
Jim Bemis	NOD
Frank Grovich	50.59/72.48 Determination
David Vanderwoude	50.59 Determination

**APPROVALS**

Richard Davis	NTD – CFDM
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