

Andrea L. Sterdis Manager, Regulatory Affairs Decommissioning & Records Management

10 CFR 50.90

July 29, 2014

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

Subject:

Docket No. 50-361 and 50-362

Clarifications Regarding the Implementation of the Certified Fuel

Handler Training and Retraining 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 October 21, 2013; Subject: Amendment Application Numbers 265 and 250, Responsibility, Organization, and Qualifications, San Onofre Nuclear Generating Station, Units 2 and 3 (ML 13296A013)
- (2) Letter from Mr. Richard J. St Onge (SCE) to the U.S. Nuclear Regulatory Commission (USNRC), dated August 20, 2013, Request for Approval of the Safe Storage Shift Manager/Certified Fuel Handler Training Program, San Onofre Nuclear Generating Station, Units 2 and 3 (ML 13234A024)

Dear Sir or Madam:

By letter dated October 21, 2013 (Reference 1), Southern California Edison (SCE) submitted license amendment applications 265 and 250 to operating licenses NPF-10 and NPF-15 for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3, respectively. Amendment Applications 265 and 250 consist of proposed changes to the Technical Specifications (TS). The proposed TS 5.1, Responsibility, TS 5.2, Organization, and TS 5.3, Staff Qualifications reflect the permanently defueled condition of the plant.

On August 20, 2013, SCE submitted a request for Commission Approval of a Certified Fuel Handler Training Program (Reference 2).



SCE is hereby providing clarifications regarding the implementation of the reference proposed changes to the Technical Specifications (TS) and the CFH Training and Retraining Program. In particular, SCE is offering clarification regarding the implementation of TS 5.3.1.

Training of the unit staff in accordance with proposed Technical Specification 5.3.1 will be consistent with the requirements of the American National Standards Institute (ANSI) in ANSI/N18.1 - 1971, "Selection, and Training of Personnel for Nuclear Power Plants," except for such items that are no longer applicable based upon the permanently shut down and defueled condition of SONGS Units 2 and 3. The following is an example of an exception to ANSI/N18.1-1971. However, exceptions are not limited to this specific example.

• The requirement that the Operations Manager should hold an SRO license at the time of appointment will no longer be applicable.

There are no new regulatory commitments in this letter.

Should you have any questions, or require additional information, please contact Mr. Mark Morgan at (949) 368-6745.

Sincerely,

Andrea Leds

cc: M. L. Dapas, Regional Administrator, NRC Region IV

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