

10 CFR 50.54(a)

December 11, 2014

ZS-2014-0430

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Zion Nuclear Power Station, Units 1 and 2  
Facility Operating License Nos. DPR-39 and DPR-48  
NRC Docket Nos. 50-295 and 50-304

Subject: Response to Proposed Change to Quality Assurance Project Plan, Revision 7

References:

- 1) John Hickman (NRC) Letter to John Sauger (ZionSolutions), "Zion Nuclear Power Station, Units 1 and 2 – Request for NRC Approval of Revision 7 to the Zion Nuclear Power Station Quality Assurance Project Plan," dated November 20, 2014
- 2) Gerard van Noordennen (ZionSolutions) Letter to U. S. NRC Document Control Desk, "License Amendment Change Request Related to the Unloaded Spent Fuel Pool, Zion Nuclear Power Station, Units 1 and 2," dated March 17, 2014
- 3) John Sauger (ZionSolutions) Letter to U. S. NRC Document Control Desk, "Supplement 1 to License Amendment Request Related to the Unloaded Spent Fuel Pool, Zion Nuclear Power Station, Units 1 and 2," dated September 10, 2014
- 4) NRC Administrative Letter 95-06, Relocation of Technical Specification Administrative Controls Related To Quality Assurance, dated December 12, 1995

In response to the NRC request for additional information regarding a proposed change to facility staff qualifications contained in the Quality Assurance Project Plan (QAPP), Appendix B, Section 5.3.1, Revision 7 (Reference 1), ZionSolutions offers the following information. The proposed change to this QAPP section provided additional detail that the qualifications required to meet ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971, were contained in implementing procedures. The proposed wording implied that some Zion Nuclear Power Station (ZNPS) staff did not have to meet or exceed the ANSI N18.1 training and qualification requirements. The purpose of this letter is to clarify that the ZNPS staff, including Health Physics personnel, shall continue to meet or exceed ANSI N18.1 training and qualification requirements for decommissioning activities including final status surveys. ZionSolutions commits to revise the QAPP, Appendix B, Section 5.3.1 at the next revision or during the biennial review, whichever occurs earlier to reflect this clarification.

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Proposed QAPP Revisions 5 and 6 were included with a license amendment request (References 2 and 3) to transfer the remaining administrative Technical Specifications to the QAPP (Reference 4). Revision 7 will be available for implementation once the license amendment is issued and after fuel transfer to the ISFSI is completed in January 2015. Revision 7 includes the proposed changes from Revisions 5 and 6. In accordance with 10 CFR 50.54(a), ZionSolutions will implement proposed Revision 7 to the QAPP upon approval by the NRC and after all spent fuel has been transferred to the ISFSI.

This letter contains regulatory commitments as described in Attachment 1. ZionSolutions requests approval of the proposed change by January 2015.

If you should have any questions regarding this submittal, please contact me at (224) 789-4025.

Respectfully,



Gerard van Noordennen  
Vice President Regulatory Affairs  
ZionSolutions, LLC

Attachment:

- 1) List of Regulatory Commitments

cc: John Hickman, U.S. NRC Senior Project Manager  
Service List

## **Zion Nuclear Power Station, Unit 1 and 2 License Transfer Service List**

**cc:**

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### List of Regulatory Commitments

The table identified actions discussed in the License Amendment Request that ZionSolutions, LLC commits to perform.

Any other actions discussed in this submittal are described for the NRC's information and are not commitments.

| COMMITMENT  | TYPE   |
|---|--|
|   | ONE-TIME ACTION –<br>DUE DATE  |
| ZionSolutions shall revise the QAPP, Appendix B, Section 5.3.1 to clarify that the ZNPS staff including Health Physics personnel shall continue to meet or exceed ANSI N18.1, March 8, 1971 training and qualification requirements for decommissioning activities including final status surveys (CR-2014-001283). | At the next revision of the QAPP or by the next biennial review, whichever occurs earlier. |