

NRR-PMDAPem Resource

From: Huffman, William
Sent: Thursday, April 07, 2016 2:00 PM
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Cc: Hawes, Mark; Huckabay, Victoria; Weerakkody, Sunil; Koenick, Stephen; Lamb, John; Khanna, Meena
Subject: MF7282 - Draft RAI Regarding the Proposed FitzPatrick Certified Fuel Handler Training Program for Permanent Reactor Shutdown

**DRAFT REQUEST FOR ADDITIONAL INFORMATION (RAI)
REGARDING REQUEST FOR APPROVAL OF A CERTIFIED FUEL HANDLER TRAINING AND
RETRAINING PROGRAM**

**JAMES A. FITZPATRICK NUCLEAR POWER PLANT
ENTERGY NUCLEAR OPERATIONS, INC
DOCKET NO. 50-333
RENEWED FACILITY OPERATING LICENSE NO. DPR-59**

By letter dated January 15, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16015A455), Entergy Nuclear Operations, Inc. (ENO or the licensee) submitted a request for U. S. Nuclear Regulatory Commission (NRC) approval of the James. A FitzPatrick (JAF) Certified Fuel Handler (CFH) Training and Retraining Program, pursuant to the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.2. On March 16, 2016, pursuant to 10 CFR 50.82(a)(1)(i), ENO provided a formal notification to the NRC of its intention to permanently cease power operations of JAF on January 27, 2017 (ADAMS Accession Number ML16076A391). Upon permanent cessation of operations and permanent removal of fuel from the reactor vessel, licensed senior reactor operators and reactor operators will no longer be required to support plant operating activities. Therefore, ENO is requesting approval of the CFH Training and Retraining Program, which is needed to provide training to personnel who will facilitate activities associated with decommissioning and irradiated fuel handling and management.

The NRC staff has determined that additional information is needed to continue the review as discussed below.

This item is identified as draft at this time to confirm your understanding of the item and of the information needed to complete our evaluation. If the request for information is understood, please respond to this request for additional information within 30 days of the date of this request.

Please call me at 301-415-2046 if you would like to set up a conference call to clarify the request for information.

Respectfully,

Bill Huffman
FitzPatrick Project Manager
NRR/DORL/LPL4-2
U.S. Nuclear Regulatory Commission
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RAI-1 Title 10 of the *Code of Federal Regulations* (CFR) Part 50, Domestic Licensing of Production and Utilization Facilities, Section 50.120, "Training and qualification of nuclear power plant personnel," states, in part: "(b)(3)... The training program must be periodically evaluated and revised as appropriate to reflect industry experience as well as changes to the facility, procedures, regulations, and quality assurance requirements."

Provide additional information regarding how the James A. FitzPatrick Nuclear Power Plant (JAF) Certified Fuel Handler (CFH) Training and Retraining Program provides for periodic evaluation and incorporation of changes to the program, as appropriate, to reflect industry experience, changes to the facility, procedures, regulations, and quality assurance requirements.

RAI-2 The following questions apply to Section 1, "Introduction," of the JAF CFH Training and Retraining Program:

- a. First paragraph on page 1 of the document refers to the "training program to be implemented by the licensees."

Clarify if the "licensees" is in reference to JAF.

- b. Second paragraph on page 1 of the document states, in part: "The program shall comply with facility Technical Specifications..." Further, the same paragraph states, in part: "...candidates in the training program shall meet minimum applicable operator experience requirements of the facility Technical Specifications. Changes to this program may be made provided the program continues to comply with the Technical Specifications."

Provide additional information regarding which Technical Specifications are being referred to in the abovementioned paragraph. In your response, clarify why the CFH Training and Retraining Program does not explicitly reference American National Standards Institute (ANSI)/American Nuclear Society (ANS) 3.1-1978, "American National Standard for Selection and Training of Nuclear Power Plant Personnel," which is referenced in the current JAF Technical Specifications (TS) 5.3, "Plant Staff Qualifications."

- c. Third paragraph, item 2 on page 1 of the document states, in part: "If required, amendment to the facility license..."

Clarify if the "facility license" is in reference to the JAF license. Further, clarify the reason for including the "if required" statement, considering the fact that Entergy Nuclear Operations (ENO) has already submitted a license amendment request (LAR) for the NRC staff's review, proposing changes to the staffing and training requirements for JAF staff contained in Section 5.0, Administrative Controls, of the JAF TS, by letter dated January 15, 2016 (ADAMS Accession Number ML16015A456).

- d. First paragraph on page 2 of the document states, in part: "Such exemptions, including the basis, shall be documented." (Note that the same statement also appears in Section 1.1, "Initial Training Program," subsection "Exemption from Training Requirements," on page 3 of the document, and in Section 1.2, "Retraining Program," subsection "Exemption of Maintenance of Qualification Requirements," on page 7 of the document.)

Provide additional information regarding what process (or procedure) will be used for documenting exemptions from training requirements.

- e. Clarify if the JAF CFH Training and Retraining Program adheres to the guidelines of NUREG-1220, "Training Review Criteria and Procedures," Revision 1. If there are deviations from the guidance provided in NUREG-1220, Revision 1, describe how the training program complies with the requirements for systems approach to training (SAT)-based training.

RAI-3 The following questions apply to Section 1.1, “Initial Training Program,” of the JAF CFH Training and Retraining Program:

- a. Subsection “Eligibility Requirements” states, in part: “Candidates for enrollment in the Certified Fuel Handler initial training program shall meet the applicable requirements of the facility Technical Specifications.”

Provide additional information regarding which Technical Specifications are being referred to in the above statement. In your response, clarify what minimum education, experience, and other requirements a candidate for enrollment in the CFH initial training program has to meet.

- b. Subsection “Examination” states, in part: “Critical tasks for a JPM [Job Performance Measure] will be pre-identified as defined in Supplement 1 to NUREG-1021, “Operator Licensing Examination Standards for Power Reactors.” (Note that Section 1.2, “Retraining Program,” subsections “Course Schedule,” and “Examinations,” also invoke Supplement 1 to NUREG-1021.)

Clarify which revision of the abovementioned NUREG will be used. Confirm that the same revision of the document is being referred to in Sections 1.1 and 1.2.

- c. Subsection “Exemption from Training Requirements” states, in part: “...individuals who hold a current NRC issued Reactor Operator or Senior Reactor Operator license may be evaluated to determine if they satisfy all of the requirements of this training program.”

Clarify if the abovementioned statement refers to licensed Reactor Operators and Senior Reactor Operators only at JAF or from any NRC-regulated commercial nuclear power reactor in the U.S.

RAI-4 Section 1.2, “Retraining Program,” subsection “Examination Failures,” states, in part: “Only those portions that were originally failed need to be successfully re-examined prior to restoring qualifications.”

Clarify whether the above statement refers to the entire written or operating exam that would need to be re-taken, or just a portion of either written or operating exam that was failed during the examination.

RAI-5 Section 1.5, “Evaluating Changes to the CFH Training and Retraining Program,” states, in part: “...changes may be made to the program elements without NRC approval as long as: (1) suitable proficiency in performance of the program activities is maintained; and (2) changes are documented in an accessible manner that will allow the NRC to verify the adequacy of the program in accordance with 10 CFR 50.120.”

Clarify whether in addition to the above two requirements, changes to the program made without prior NRC approval must also be such that the program continues to comply with the pertinent Technical Specifications. (Note that a statement to that effect was included in the second paragraph of Section 1, “Introduction.” Also see question 1, item (b) above.)

RAI-6 For RAIs 1 through 5 above, consider revising the JAF CFH Training and Retraining Program, as appropriate, to make any necessary changes or include the information provided by your responses, if needed. In your response, state if such changes were or will be made, and identify which Section(s) of the document were or will be revised, as appropriate.

Hearing Identifier: NRR_PMDA
Email Number: 2786

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