



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 16, 2016

Mr. Bryan C. Hanson
President and Chief Nuclear Officer
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: OYSTER CREEK NUCLEAR GENERATING STATION - REQUEST FOR
ADDITIONAL INFORMATION REGARDING REQUEST FOR APPROVAL OF
A CERTIFIED FUEL HANDLER TRAINING AND RETRAINING PROGRAM
(CAC NO. MF7292)

Dear Mr. Hanson:

By letter dated January 29, 2016 (Agencywide Documents Access and Management System Accession No. ML16029A387), Exelon Generation Company, LLC (Exelon) submitted its Certified Fuel Handler Training and Retraining Program for the Oyster Creek Nuclear Generating Station to the U.S. Nuclear Regulatory Commission (NRC) for approval.

The NRC staff has reviewed the licensee's submittal and determined additional information is required to enable the NRC staff to make an independent assessment regarding its technical review. The enclosure to this letter describes this request for additional information (RAI). On April 30, 2016, the draft questions were sent to Mr. David Helker, Mr. Richard Gropp, and Mr. Paul Bonnet of your staff to ensure that they were understandable, the regulatory bases for the questions were clear, and to determine if the information was previously docketed. A teleconference was held on May 11, 2016, to clarify the RAI questions. Exelon stated that they would respond to the RAI within 30 days of the date of this letter. If you have any questions, please contact me at 301-415-3100 or via e-mail at John.Lamb@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "John G. Lamb".

John G. Lamb, Senior Project Manager
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-219

Enclosure:
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION
RELATED TO CERTIFIED FUEL HANDLER TRAINING AND RETRAINING PROGRAM
EXELON GENERATION COMPANY, LLC
OYSTER CREEK NUCLEAR GENERATING STATION
DOCKET NO. 50-219

By letter dated January 29, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16029A387), Exelon Generation Company, LLC (Exelon) submitted its Certified Fuel Handler (CFH) Training and Retraining Program for the Oyster Creek Nuclear Generating Station (OCNGS) to the U.S. Nuclear Regulatory Commission (NRC) for approval.

The NRC staff has reviewed the licensee's submittal and has determined that additional information is required to enable the NRC staff to make an independent assessment regarding its technical review. Below are the request for additional information (RAI) questions based on the Attachment to Exelon's letter dated January 29, 2016.

RAI

1. In the abovementioned letter, Exelon requested NRC approval of the CFH Training and Retraining Program for OCNGS. Section 1, "Purpose," of the Exelon Generation CFH Training and Retraining Program states that the purpose of the document is to "outline development of a certified fuel handler training and qualification program for an Exelon Generation nuclear facility that is permanently shutdown and permanently defueled."

Clarify if the CFH Training and Retraining Program is applicable to all Exelon facilities that have transitioned to a permanently defueled status or if it is specific to OCNGS.

2. Section 2, "Terms and Definitions," of the Exelon CFH Training and Retraining Program, Subsection 2.3 defines an NRC-Licensed Operator as: "An individual who possesses an active or inactive NRC operator license or senior operator license pursuant to 10 CFR 55 [Title 10 of the *Code of Federal Regulations*, Part 55], "Operators' Licenses."" Further, Section 3.2.4, "Candidate Evaluation," Subsection 3.2.4.7 states, in part: "Training of current NRC-licensed Operators (i.e., 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 the definition of an "NRC-Licensed Operator" and explain the differences between an active and inactive operator license (or senior operator license), as used in the definition. Further, clarify what a "current NRC-licensed Operator" is, as used in Subsection 3.2.4.7, and discuss how the distinction of a "current" licensed operator is important in the context of the candidate evaluation process. In addition, clarify if the abovementioned statement in Subsection 3.2.4.7 refers to licensed Reactor Operators and Senior Reactor Operators only at OCNGS or from any NRC-regulated commercial nuclear power reactor in the U.S.

Enclosure

3. The following questions apply to Section 3.1, "General Guidelines," of the Exelon CFH Training and Retraining Program, Subsection 3.1.7, which states: "Changes to the Certified Fuel Handler Training and Retraining Program may be made without prior NRC approval provided the changes are appropriately evaluated in accordance with applicable change processes and the program continues to comply with the specified ANSI [American National Standards Institute]/ANS [American Nuclear Society] standard requirements, or equivalent."
 - a. Provide additional information regarding what "applicable change processes" are being referred to in the abovementioned statement. In your response, clarify if evaluation of changes to the CFH Training and Retraining Program will be conducted in such manner that ensures that: (1) suitable proficiency in the performance of the program's 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, Part 50, Section 120, "Training and qualification of nuclear power plant personnel."
 - b. Provide additional information regarding what requirements may be considered to be equivalent to ANSI/ANS-3.1-1978, "American National Standard for Selection and Training of Nuclear Power Plant Personnel," which is the standard identified in Section 6.3.1 of the OCNCS Technical Specifications, and how such equivalency would be determined.

4. The following questions apply to Section 3.1, "General Guidelines," of the Exelon CFH Training and Retraining Program, Subsection 3.1.8:
 - a. The first sentence of Subsection 3.1.8 states, in part: "Exemption for an individual from specific training requirements other than medical examination can be processed in accordance with Exelon Generation training exemption process...." No specific statement is provided regarding whether or not the requirement for medical examination may be exempted.

Clarify if Exelon CFH Training and Retraining Program for OCNCS allows exemption from the requirement for medical examination.
 - b. The second sentence of Subsection 3.1.8 states: "The Plant Manager (or designee) may exempt an individual from a specific training requirement based upon the individual's depth of experience and previous training."

Provide additional information if any such exemptions granted by the Plant Manager (or designee) would be based on an evaluation of the individual's training and/or work history, to ensure that the intent of the exempted training objectives is satisfied.
 - c. The third sentence of Subsection 3.1.8 states: "Such exemptions, including the basis, shall be documented."

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

5. The following questions apply to Section 3.2.4, "Candidate Evaluation," of the Exelon CFH Training and Retraining Program:

- a. Subsection 3.2.4.3 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 3.1, "Course Schedule," Subsections 3.3.1.1 and 3.3.1.6 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 Section 3.1.

- b. Subsection 3.2.4.7 states, in part: "Training of current NRC-licensed Operators <...> may be evaluated to determine if they satisfy all of the requirements of this training program, or if they only need to complete portions of this program to qualify as a Certified Fuel Handler."

Provide additional information regarding whether training to address any identified gaps between the individual's training history and the CFH training program requirements will be completed prior to certification of the individual as a CFH. Further, clarify if the Plant Manager (or designee) shall be responsible for approving the basis for evaluations qualifying an individual as a CFH.

6. Section 3.3, "Retraining Program," of the Exelon CFH Training and Retraining Program, does not expressly address the eligibility requirements for enrollment of candidates in the CFH retraining program.

Clarify if the candidates for enrollment in the CFH retraining program are required to have had successfully completed the initial CFH training program. Further, provide additional information indicating if all CFHs are required to participate in the CFH retraining program.

7. Section 3.3, "Retraining Program," of the Exelon CFH Training and Retraining Program, Subsection 3.3.1.2 states, in part: "A retraining plan will be developed."

Provide additional information regarding who will be responsible for developing and approving the abovementioned retraining plan.

8. Section 3.3, "Retraining Program," of the Exelon CFH Training and Retraining Program, does not expressly address how missed training or examination of the retraining program will be addressed.

Clarify how missed training or examination of the retraining program will be handled (i.e., the specific time frame within which a CFH would have to make up any missed training or examination). Further, clarify if a CFH would be suspended from his/her

duties if the required training or evaluation is not completed within the specified makeup period, pending successful completion of the missed training or evaluation.

9. Section 3.3, "Retraining Program," of the Exelon CFH Training and Retraining Program, Subsection 3.3.1.6 states, in part: "Passing criteria for an individual JPM is that the examinee successfully completes the assigned task in accordance with the governing procedure without missing any critical steps." This subsection does not specifically address the minimum required score (as a percentage of the total number of administered JPMs) required to successfully pass the operating examination.

Provide additional information indicating the minimum percentage of the administered JPMs that the examinee would be required to pass, in order to successfully pass the operating examination.

10. Section 3.3.2, "Maintenance of Certified Fuel Handler Qualifications," of the Exelon CFH Training and Retraining Program, Subsection 3.3.2.1 lists four requirements that must be satisfied in order to maintain the CFH qualification.

Clarify if the requirement to stand the designated CFH watch for a minimum of 8 hours per calendar quarter, as described in Subsection 3.3.2.2, should be included as the fifth requirement under Subsection 3.3.2.1, instead of being separated into a stand-alone paragraph.

11. The regulations in 10 CFR 50.120, "Training and qualification of nuclear power plant personnel," paragraph (b)(3) states, in part: "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."

Section 3.4, "Program Evaluation," of the Exelon CFH Training and Retraining Program states, in part: "These assessments will also evaluate applicability of industry operating experience." Provide additional information regarding whether changes to the facility, procedures, regulations, and quality assurance requirements will be included in the periodic evaluation of the Exelon CFH Training and Retraining Program at OCNGS.

12. Section 3.5, "Record Retention," of the Exelon CFH Training and Retraining Program states: "Records associated with the Certified Fuel Handler Training and Retraining Program will be retained in retrievable format for the duration of the plant license."

Provide additional information regarding what is being referred to as "the duration of the plant license," since OCNGS will no longer have an operating plant license after certifications of permanent cessation of power operations and of removal of fuel from the reactor vessel will have been submitted, in accordance with 10 CFR 50.82(a)(1)(i) and 10 CFR 50.82(a)(1)(ii). In your response, clarify if records associated with the CFH Training and Retraining Program will be retained until there is no longer a need for a CFH position at the facility (i.e., all fuel permanently transferred to a dry fuel storage facility).

13. For questions 1 through 13 above, consider revising the Exelon CFH Training and Retraining Program, as appropriate, to make any necessary changes or include the information provided by your response, as 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.

May 16, 2016

Mr. Bryan C. Hanson
President and Chief Nuclear Officer
Exelon Generation Company, LLC
4300 Winfield Road
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Sincerely,

/RA/

John G. Lamb, Senior Project Manager
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