

June 22, 2016

Mr. Mark Richter
Senior Project Manager
Used Fuel and Decommissioning Program
Nuclear Energy Institute
1201 F Street, NW, Suite 1101
Washington, DC 20004

SUBJECT: NUCLEAR ENERGY INSTITUTE GUIDELINES FOR CERTIFIED FUEL
HANDLER TRAINING AND MANAGING PERSONNEL FATIGUE AT
DECOMMISSIONING REACTORS

Dear Mr. Richter:

On November 30, 2015, you submitted a letter on behalf of the Nuclear Energy Institute (NEI) to the U.S. Nuclear Regulatory Commission (NRC) providing two guidance documents related to nuclear power reactors transitioning from an operating status to a decommissioning status (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15350A133). The NEI guidance documents are identified as NEI 15-04, "Guidelines for a Certified Fuel Handler Training and Retraining Program" (ADAMS Accession No. ML15350A145) and NEI 15-08, "Managing Personnel Fatigue at Decommissioning Reactors" (ADAMS Accession No. ML15350A153). NEI stated that guidance documents 15-04 and 15-08 were developed to help assure consistency and efficiency in the near-term decommissioning licensing activities, until such time that a power reactor decommissioning rulemaking addressing these areas is completed. NEI requested that the NRC staff review these guideline documents, and consider them for NRC endorsement.

The NRC staff appreciates NEI's efforts in the development of the proposed reactor decommissioning guidance documents. The staff's initial assessment indicates there are positive attributes in these documents that could be used by licensees that may permanently shut down in the next several years, or until such time that a power reactor decommissioning rulemaking that addresses these specific topics goes into effect. With regard to NEI's Certified Fuel Handlers (CFH) Training Guidance, the NRC has a well-established position, as reflected in the staff approvals of the Kewaunee, Crystal River Unit 3, San Onofre Nuclear Generating Station Units 2 and 3, and Vermont Yankee CFH training programs.

As submitted, these documents do not fall within one of the defined processes for NRC endorsement or approval for use. The staff intends to treat the NEI documents submitted by the November 30, 2015, letters as informational. The staff may also use elements of these documents in support of the development of the proposed power reactor decommissioning rulemaking and associated regulatory guidance.

If NEI still desires a detailed staff evaluation of these documents at this time, NEI should submit the guidance within the constraints of a defined review process (such as a topical report in accordance with LIC-500, "Processing Requests for Reviews of Topical Reports."). NEI should

M. Richter

- 2 -

submit such a request for the review to the document control desk with a reference to an approved charge code for billing purposes. Alternatively, NEI can request an exemption from review fees, in accordance with the appropriate provisions of section 170.11(a) in Title 10 of the *Code of Federal Regulations*.

If you have any questions, please contact William Huffman at (301) 415-2046 or via e-mail at William.Huffman@nrc.gov.

Sincerely,

/RA/

Joseph J. Holonich, Senior Project Manager
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

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 Licensing Processes Branch
 Division of Policy and Rulemaking
 Office of Nuclear Reactor Regulation

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***Via email**

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