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

Subject: Response to Request for Additional Information (RAI) Regarding Request for Approval of a Certified Fuel Handler Training and Retraining Program (CAC No. MF7282)

James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
License No. DPR-59

- References:**
1. Entergy letter, "Notification of Permanent Cessation of Power Operations," JAFP-15-0133, dated November 18, 2015 (ML15322A273)
 2. Entergy letter, "Certification of Permanent Cessation of Power Operations," JAFP-16-0045, dated March 16, 2016 (ML16076A391)
 3. Entergy Letter, "Request for Approval of a Certified Fuel Handler Training and Retraining Program," JAFP-15-0142, dated January 15, 2016 (ML16015A455)
 4. NRC correspondence, "Request for Additional Information (RAI) Regarding Request for Approval of a Certified Fuel Handler Training and Retraining Program," (ML16109A255; CAC No. MF7282), dated April 7, 2016
 5. Entergy letter, "License Amendment Request – Revision to Technical Specification Administrative Controls for Permanently Defueled Condition," JAFP-15-0143, dated January 15, 2016 (ML16015A456)
 6. Entergy letter, "Response to Request for Additional Information (RAI) Regarding Revision to Technical Specification (TS) Administrative Controls for Staffing and Training Upon Permanent Cessation of Operation (CAC No. MF7280) – Supplement 1," JAFP-16-0077, dated June 3, 2016 (CAC No. MF7280)

On November 18, 2015, Entergy Nuclear Operations, Inc. (ENOI) provided formal notification to the Nuclear Regulatory Commission (NRC) of its intention to permanently cease power operations of James A. FitzPatrick Nuclear Power Plant (JAF) at the end of the current operating cycle [Reference 1]. On March 16, 2016, ENOI certified, pursuant to 10 CFR 50.82(a)(1)(i), that JAF would be permanently shut down on January 27, 2017 [Reference 2].

By letter dated January 15, 2016 [Reference 3], ENOI requested approval of the Certified Fuel Handler 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. In processing the submittal, the NRC determined that additional information was required to complete the review [Reference 4]. The specific questions provided to JAF in the NRC request for additional information (RAI) are addressed in the attachment to this letter.

Note that the ENOI license amendment request regarding revision to Technical Specification Administrative Controls [Reference 5], and the respective RAI response [Reference 6], are topical to this transmittal.

There are no new regulatory commitments in this submittal. Should you have any questions please contact Mr. William C. Drews at 315-349-6562.

Sincerely,



Brian R. Sullivan
Site Vice President
BRS/WCD/ds

Attachments: 1. Response to Request for Additional Information

cc: NRC Region 1 Administrator
NRC NRR Project Manager
NRC Resident Inspector
NYSPSC
NYSERDA

JAFP-16-0078

ATTACHMENT 1

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
(6 Pages)**

**Response to Request for Additional Information
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.

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.

Response

As described in Section 1.3 of the JAF CFH Training and Retraining Program (CFH Program), assessments of the effectiveness and accuracy of training are conducted by appropriate management personnel during and at the end of each two (2) year training cycle. Implementing program documents have yet to be finalized for the JAF CFH Program; however, ENO will ensure that the JAF CFH Training and Retraining Program contains the guidance necessary to ensure compliance with the requirements of the systems approach to training (SAT) process in 10 CFR 50.120(b)(3). Specifically, the final approved CFH Program will provide 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.

Response to Request for Additional Information

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.

Response

“Licensees” refers to the holders of Renewed Facility Operating License No. DPR-059; ENOI and Entergy Nuclear FitzPatrick, LLC (ENF).

- 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 above mentioned 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.”

Response

The abovementioned paragraph refers to JAF Technical Specification 5.3, “Plant Staff Qualifications.”

A generic reference to the TS is used in the CFH Program to avoid conflicts that may arise in the future if either TS 5.3.1 or 5.3.2 (as proposed in Reference 1) are revised or renumbered by a subsequent license amendment. For similar reasons, a specific reference to ANSI/ANS 3.1-1978 is not included in the CFH Program in the event that either the version of ANSI/ANS 3.1 applicable to JAF is changed by a future license amendment or exceptions to ANSI/ANS 3.1-1978 are added to, or removed from, the Quality Assurance Program Manual (QAPM). A generic reference to the TS in the CFH Program will therefore minimize the number of administrative revisions needed to maintain alignment with the TS and/or QAPM. ENOI has administrative controls in place to ensure that potential impacts to training program documents are identified whenever changes to the JAF licensing basis, such as the TS or QAPM, are proposed.

Note that in Reference 1, ENOI proposed to revise the title of TS 5.3 to, “Facility 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

Response to Request for Additional Information

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).

Response

The phrase "facility license" is in reference to Renewed Facility Operating License No. DPR-059. JAF TS 5.3.2 currently references requirements for NRC Licensed Senior Reactor Operators and Reactor Operators and 10 CFR 55. As discussed in Reference 1, TS 5.3.2 is proposed to be revised to replace the current language with a reference to the JAF CFH Training and Retraining Program. Although the JAF CFH Program may be approved by the NRC at any time, ENOI does not plan to fully implement the CFH Program until Reference 1 is approved and effective, which cannot occur sooner than the docketing of the certifications of permanent cessation of operations and permanent removal of fuel from the reactor vessel, pursuant to 10 CFR 50.82(a)(1).

- 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.

Response

Exemptions from training requirements, including the basis, shall be documented using a process similar to Entergy fleet training procedure EN-TQ-212, Conduct of Training and Qualification. Although the JAF CFH Training and Retraining Program documents have not been finalized, draft procedural requirements provide guidance on the exemption process and the form to be used. The draft procedure outlines the following criteria to be evaluated in consideration of any exemption/alternate qualifications:

- *Previous training, education, and experience records*
- *Knowledge based examination*
- *Skill based examination*

- 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.**

Response

Although the JAF CFH Training and Retraining Program documents have not been finalized, the program will adhere to the guidelines of NUREG-1220, "Training Review Criteria and Procedures," Revision 1 that are applicable to a permanently defueled facility.

Procedure EN-TQ-201, Systematic Approach to Training Process, defines the requirements for the fleet to maintain a systematic approach to training. The JAF

Response to Request for Additional Information

CFH Training and Retraining Program will align with the provisions of 10 CFR 50.120 and 10 CFR 55.4 for SAT. The five key elements for a SAT are:

1. Systematic analysis of the jobs to be performed.
2. Learning objectives derived from the analyses which describe desired performance after training.
3. Training design and implementation based on the learning objectives.
4. Evaluation of trainee mastery of the objectives during training.
5. Evaluation and revision of the training based on the performance of trained personnel in the job setting.

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.

Response

The above statement is in reference to JAF TS 5.3.1. The minimum education, experience, and other requirements a candidate for enrollment in the JAF CFH Program must meet are as follows (Reference ANSI/ANS 3.1-1978 Section 4.5.1):

1. High school diploma or equivalent
2. Two (2) years of power plant experience
3. One year of nuclear power plant experience; at least six (6) months of which shall be at JAF
4. Possess a high degree of manual dexterity and mature judgment

- 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.

Response

Procedure EN-TQ-105, NRC Initial License Examination, Development, and Administration, specifies that the NUREG-1021 revision in effect six (6) months prior to the exam administration date is to be used. NUREG-1021 Revision 10 is current at JAF. Revision 10, or later, will be used to identify critical tasks and is also the revision being referred to in Sections 1.1 and 1.2 of CFH Training and Retraining Program.

Response to Request for Additional Information

- 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.

Response

The statement refers to licensed Reactor Operators and Senior Reactor Operators only at JAF.

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.

Response

Written exam failures will require retake of the entire written exam; operating exam failures will require retake of the entire operating exam.

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.)

Response

Changes to the JAF Training and Retraining Program made without prior NRC approval ensures that the program continues to comply with TS 5.3.1, which states the following:

Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Quality Assurance Program Manual (QAPM)¹.

In addition to the above two requirements, changes made to the CFH Training and Retraining Program without prior NRC approval will ensure that the program continues to comply with TS 5.3.1.

¹ Note that ENOI proposed revision of TS 5.3.1 to remove the word “Entergy” from the title of the Quality Assurance Program Manual (QAPM) by letter dated January 15, 2016 (ML16015A456).

Response to Request for Additional Information

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.

Response

Based on the RAI responses above, no revisions to the JAF CFH Training and Retraining Program are proposed. The responses provide clarification and do not represent a material change to the JAF CFH Program that was originally submitted.

REFERENCE

1. Entergy letter, "License Amendment Request – Revision to Technical Specification Administrative Controls for Permanently Defueled Condition," JAFP-15-0143, dated January 15, 2016 (ML16015A456)