

## **NRR-PMDAPem Resource**

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**From:** Huffman, William  
**Sent:** Monday, July 18, 2016 7:36 AM  
**To:** Bill Drews (WDrews1@entergy.com); Hawes, Mark  
**Cc:** Wengert, Thomas; Lamb, John; Huckabay, Victoria; Anderson, Shaun; Weerakkody, Sunil  
**Subject:** MF7282 - Supplemental Draft RAIs Concerning the James A FitzPatrick Certified Fuel Handler Training and Retraining Program for Permanent Reactor Shutdown

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

**ENTERGY NUCLEAR OPERATIONS. INC  
JAMES A. FITZPATRICK NUCLEAR POWER PLANT**

**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. (ENOI 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), ENOI provided a formal notification to the NRC of its intention to permanently cease power operations of JAF on January 27, 2017 (ADAMS Accession No. 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, ENOI 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.

On April 7, 2016, the staff sent draft RAIs (ADAMS Accession No. No. ML16109A255) to ENOI related to ENOI's request for approval of the JAF certified fuel handler training and retraining program.

ENOI responded to the RAIs in a letter to the NRC dated June 3, 2016 (ADAMS Accession No. ML16155A327). On July 1, 2016, the NRC staff conducted a clarification call with ENOI to clarify the licensee's RAI responses.

The clarification call participants included:

Entergy

Doug Lindsey – Reactor Operator  
Bill Drews - Regulatory Assurance Manager  
Phil Couture –Corporate Licensing  
Mark Hawes–Licensing Specialist

NRC

Bill Huffman – FitzPatrick Project Manager  
Victoria Huckabay – Reactor Operations Engineer (Human Factors)

Tom Wengert – Fitzpatrick Project Manager

As discussed in the clarification call, supplemental information is needed by the NRC staff to complete its evaluation. Note that this RAI has been numbered to sequentially follow the previous RAIs issued on April 7, 2016.

These RAIs are identified as draft at this time to confirm your understanding 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 301-415-4037 if you would like to set up a conference call to clarify the request for information.

The NRC will make this e-mail documenting the RAI clarification call and supplemental draft RAI publicly available by placing it in ADAMS via the NRC e-capture process.

RAI-7 By letter dated June 3, 2016 (ADAMS Accession No. ML16155A327), Entergy Nuclear Operations, Inc. (ENOI) provided a response to the request for additional information (RAI) regarding a Certified Fuel Handler (CFH) Training and Retraining Program for James A. FitzPatrick Nuclear Power Plant (JAF). The NRC staff reviewed the response and determined that additional information is required to complete the review, as described below:

- a. In response to RAI-1, ENOI stated, in part: “Implementing program documents have yet to be finalized for the JAF CFH Program; however, ENOI 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.”

Please revise and resubmit the CFH Training and Retraining Program, submitted by letter dated January 15, 2016 (ADAMS Accession No. ML16015A455), to include the information provided in the abovementioned RAI response. In your RAI response, identify which Section(s) of the document were revised.

- b. In response to RAI-2, Item (e), ENOI stated, in part: “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.”

Please revise and resubmit the JAF CFH Training and Retraining Program to include the information included in the abovementioned RAI response.

- c. Section 1.1, “Initial Training Program,” of the JAF CFH Training and Retraining Program, 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.)

In response to RAI-3, Item (b), ENOI stated: “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.”

The staff notes that, based on the ENOI response to the RAI, the wording in JAF CFH Training and Retraining Program may be in error, since Revision 10 of NUREG-1021 does not contain Supplement 1. Please revise and resubmit the JAF CFH Training and Retraining Program to make the necessary changes. In your RAI response, identify which Section(s) of the document were revised.

RAI-8 Title 10 of the *Code of Federal Regulations* (CFR) Part 55, "Operators' Licenses," Section 55.4, states, in part: "Systems approach to training means a training program that includes the following five elements:

- (1) Systematic analysis of the jobs to be performed.
- (2) Learning objectives derived from the analysis which describe desired performance after training.
- (3) Training design and implementation based on 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.

Section 1, "Introduction," of the CFH Training and Retraining Program for JAF states, in part, that the program will be based on a systems approach to training (SAT) process.

Please provide additional information in your response that describes how element 3 of the SAT-based program is implemented within the CFH Training and Retraining Program for JAF. In your RAI response, clarify what process/procedure provides specific guidance on training design and implementation, such as guidance on training program oversight, administration, analysis of training needs, development of lesson objectives and lesson plans, design and development of training materials, conduct of training, evaluation of training effectiveness, and record keeping. Please include this information in the revised JAF CFH Training and Retraining Program.

Respectfully,

Tom Wengert  
Project Manager  
NRR/DORL/LPL4-2  
U.S. Nuclear Regulatory Commission

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 2949

**Mail Envelope Properties** (William.Huffman@nrc.gov20160718073600)

**Subject:** MF7282 - Supplemental Draft RAIs Concerning the James A FitzPatrick Certified Fuel Handler Training and Retraining Program for Permanent Reactor Shutdown  
**Sent Date:** 7/18/2016 7:36:13 AM  
**Received Date:** 7/18/2016 7:36:00 AM  
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<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	7723	7/18/2016 7:36:00 AM

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**Expiration Date:**

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