



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

March 15, 2017

Ms. Mary J. Fisher
Senior Director for Decommissioning
Omaha Public Power District
Fort Calhoun Station
9610 Power Lane, Mail Stop FC-2-4
Blair, NE 68008

SUBJECT: FORT CALHOUN STATION, UNIT NO. 1 – REQUEST FOR ADDITIONAL
INFORMATION REGARDING CERTIFIED FUEL HANDLER TRAINING
PROGRAM (CAC NO. MF8112)

Dear Ms. Fisher:

By letter dated July 7, 2016, Omaha Public Power District (OPPD) submitted a request for approval of the Certified Fuel Handler Training and Retraining Program at Fort Calhoun Station, Unit No. 1. By letter dated October 7, 2016, OPPD provided supplemental information, in response to a request for additional information from the U.S. Nuclear Regulatory Commission (NRC) staff. The NRC staff has reviewed the information provided in your submittal and supplemental information and determined that additional information is required in order to complete its formal review of your request. The enclosed questions were provided to E. Matzke of your staff on March 9, 2017. Please provide a response to the enclosed questions within 30 days of the date of this letter.

If you have any questions, please contact me at 301-415-4125 or via e-mail at James.Kim@nrc.gov.

Sincerely,

A handwritten signature in black ink that reads "James Kim".

James Kim, Project Manager
Special Projects and Process Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-285

Enclosure:
Request for Additional Information

cc: Listserv

REQUEST FOR ADDITIONAL INFORMATION

CERTIFIED FUEL HANDLER TRAINING AND RETRAINING PROGRAM

OMAHA PUBLIC POWER DISTRICT

FORT CALHOUN STATION, UNIT NO. 1

DOCKET NO. 50-285

By letter dated July 7, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16190A208), Omaha Public Power District (OPPD, the licensee) submitted a request for approval of the Certified Fuel Handler (CFH) Training and Retraining Program at Fort Calhoun Station, Unit No. 1 (FCS). By letter dated October 7, 2016 (ADAMS Accession No. ML16281A479), OPPD provided supplemental information, in response to a request for additional information (RAI) from the U.S. Nuclear Regulatory Commission (NRC) staff dated September 20, 2016 (ADAMS Accession No. ML16263A049). The NRC staff has reviewed the information provided in the licensee's submittal and supplemental information and determined that the following additional information is required in order to complete its formal review of OPPD's request:

1. Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," Section 50.2, "Definitions," provides the following definition for a Certified Fuel Handler:

Certified fuel handler means, for a nuclear power reactor facility, a non-licensed operator who has qualified in accordance with a fuel handler training program approved by the Commission.

The OPPD CFH Training and Retraining Program for FCS was provided in the Attachment to OPPD's submittal. Section 2, "Terms and Definitions," of the OPPD CFH Training and Retraining Program, Subsection 2.4 defines "Inactive License" as "[t]he license held by an individual who attends and successfully completes the requirements of the LORT program but does **not** meet the on-shift hours requirement for maintaining an Active License. Refer to OP-AA-105-02, NRC Active License Maintenance, for additional guidance."

- a. Provide a definition of the acronym "LORT," as used in Section 2 of the document.
- b. Provide a copy of procedure OP-AA-105-02 for the NRC staff's review.

Provide replacement page(s) for the OPPD CFH Training and Retraining Program reflecting any changes made to the document, in response to this RAI, as necessary.

2. 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... Sufficient records must be maintained by the licensee to maintain program integrity and kept available for NRC inspection to verify the adequacy of the program."

Enclosure

Section 3.5, "Program Evaluation," of the OPPD CFH Training and Retraining Program states, in part: "Any required changes to the program determined by the station oversight board, shall be incorporated into the program."

Section 3.1, "General Guidelines," of the OPPD CFH Training and Retraining Program, Subsection 3.1.7 states, in part: "Changes to the Certified Fuel Handler Training and Retraining Program may be made without NRC approval provided the changes are appropriately evaluated in accordance with applicable change processes..."

By letter dated October 7, 2016, OPPD provided supplemental information in response to an RAI from the NRC staff. The PRA [Probabilistic Risk Assessment] Operations and Human Factors Branch staff reviewed OPPD's responses to the staff's request for additional information and determined that additional information is required to complete the review.

Provide information regarding what "applicable change processes" are being referred to in the abovementioned statement. In your response, clarify if evaluation of changes to the OPPD 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 50.120.

Provide replacement page(s) for the OPPD CFH Training and Retraining Program reflecting any changes made to the document, in response to this RAI, as necessary.

3. 10 CFR Part 55, "Operators' Licenses," Section 55.4, "Definitions," provides the definition of a systems approach to training (SAT), which states, in part:

Systems approach to training means a training program that includes the following five elements:

...

- (4) Evaluation of trainee mastery of the objectives during training.

NUREG-1220, Revision 1, "Training Review Criteria and Procedures," January 1993 (ADAMS Accession No. ML102571869), Section 3.D, "SAT Element Evaluation," Subsection "SAT Element 4 (Trainee Evaluation)" states, in part, that trainees should be evaluated during all aspects of training to determine their progress toward mastery of job performance requirements. It further provides review guidance for each of the applicable program characteristics, including the following: "4.5 Training and task performance exemptions are objectively based."

Section 3.3.3.1 of the OPPD CFH Training and Retraining Program states: "To maintain the Certified Fuel Handler qualification, the following requirements must be satisfied or they may be exempted per Step 3.1.8."

Section 3.1.8, "Exemption of Training Requirements," Subsection 3.1.8.3 of the OPPD CFH Training and Retraining Program states: "No individual may be exempted from any two consecutive annual operating or two consecutive biennial written examinations."

Provide information regarding what criteria can be used to exempt an individual from any single annual operating or biennial written examination (for example, if an individual who prepared the examination may be exempted from such a requirement).

Further, clarify if exemptions may be granted from any of the requirements of Section 3.3.3.1. For example, clarify whether an individual may be exempted from the requirements of Subsection 3.3.3.1.2 ("Score \geq 80 percent on the biennial written examination"), or Subsection 3.3.3.1.5 ("Stand the designated Certified Fuel Handler watch for a minimum of eight (8) hours per calendar quarter...").

Provide replacement page(s) for the OPPD CFH Training and Retraining Program reflecting any changes made to the document, in response to this RAI, as necessary.

4. 10 CFR 50.2, "Definitions," provides the following definition for a Certified Fuel Handler:

Certified fuel handler means, for a nuclear power reactor facility, a non-licensed operator who has qualified in accordance with a fuel handler training program approved by the Commission.

10 CFR 50.120, "Training and qualification of nuclear power plant personnel," states, in part:

(b)(2) The training program must be derived from a systems approach to training as defined in 10 CFR 55.4, and must provide for the training and qualification... of nuclear power plant personnel:
(i) Non-licensed operator.

10 CFR Part 55.4, "Definitions," provides the definition of a systems approach to training which states, in part:

Systems approach to training means a training program that includes the following five elements:

...
(2) Learning objectives derived from the analysis which describe desired performance after training.
(3) Training design and implementation based on the learning objectives.

It is not clear how elements (2) and (3) of the SAT-based approach are addressed in the OPPD CFH Training and Retraining Program. Provide additional information regarding how the OPPD CFH Training and Retraining Program, as described in Section 3.2, "Initial Training," addresses elements (2) and (3) of the SAT-based approach.

Provide replacement page(s) for the OPPD CFH Training and Retraining Program reflecting any changes made to the document, in response to this RAI, as necessary.

5. 10 CFR 50.2, "Definitions," provides the following definition for a Certified Fuel Handler:

Certified fuel handler means, for a nuclear power reactor facility, a non-licensed operator who has qualified in accordance with a fuel handler training program approved by the Commission.

10 CFR 50.120, "Training and qualification of nuclear power plant personnel," states, in part:

(b)(2) The training program must be derived from a systems approach to training as defined in 10 CFR 55.4, and must provide for the training and qualification of ... nuclear power plant personnel:

(i) Non-licensed operator.

10 CFR Part 55, "Operators' Licenses," Section 55.4, "Definitions," provides the definition of a SAT, which states, in part:

Systems approach to training means a training program that includes the following five elements:

...

(4) Evaluation of trainee mastery of the objectives during training.

Although 10 CFR 50.120 does not address the specifics of how a non-licensed operator becomes qualified as a CFH through the Commission-approved fuel handler training program, regarding the relationship between qualification and training, the Commission stated the following in the Final Rule, "Training and Qualification of Nuclear Power Plant Personnel," published in the *Federal Register* on April 26, 1993 (58 FR 21904):

As stated in the preamble for the proposed rule, qualification in the context of this rule means job task qualification. The proposed rule contained the requirement that licensees and applicants develop, implement, and maintain a SAT-based training program to ensure that nuclear power personnel are qualified to perform the tasks of their jobs. Because licensees and applicants must comply with all applicable regulations, there should be no ambiguity concerning the fact that successful completion of a training program does not obviate the need to comply with any other training or qualification requirements imposed by other regulations or license conditions. This means that nuclear power plant personnel must also meet the licensees' initial job qualification requirements imposed as part of initial employment.

Section 3.2.4, "Candidate Evaluation," Subsection 3.2.4.7, of the OPPD CFH Training and Retraining Program 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." Further, Subsection 3.2.4.7.1 states: "This evaluation will focus on the differences between the requirements of a Certified Fuel Handler and an NRC-licensed Operator to identify any additional training required prior to becoming a Certified Fuel Handler."

Subsection 3.2.4.9 of the OPPD CFH Training and Retraining Program states, in part: "In general, the training of holders of Senior Reactor Operator licenses who are also qualified as Fuel Handling Supervisors will meet the qualification requirements for a Certified Fuel Handler. However, it is expected that some additional training requirements may arise as the plant transitions to a permanently shutdown and defueled

configuration. <...> The training history of each currently licensed Senior Reactor Operator who is identified as a candidate for a Certified Fuel Handler qualification will be separately evaluated to ensure that all the specific training requirements of the Certified Fuel Handler Training and Retraining Program are met.”

While Sections 3.2.4.7 and 3.2.4.9 address the identification and evaluation of gaps between the training requirements for CFHs and the training of licensed Reactor Operators and Senior Reactor Operators, they do not describe how such gaps should be closed. Provide additional information regarding whether training to address any identified gaps between the individual’s training history and the OPPD CFH training program requirements will be completed prior to certification of that individual as a CFH.

Further, provide additional information identifying the position of the individual responsible for approving the basis for evaluations qualifying an individual as a CFH.

Provide replacement page(s) for the OPPD CFH Training and Retraining Program reflecting any changes made to the document, in response to this RAI, as necessary.

6. Section 3.3.2, “Course Schedule,” Subsection 3.3.2.5, of the OPPD CFH Training and Retraining Program states, in part: “Areas examined are described in Appendices A and B for the written and operating examinations, respectively.” The OPPD CFH Training and Retraining Program does not contain Appendices A and B.

Clarify if the abovementioned statement should instead refer to Attachments 1 and 2, instead of Appendices A and B.

Provide replacement page(s) for the OPPD CFH Training and Retraining Program reflecting any changes made to the document, in response to this RAI, as necessary.

7. 10 CFR 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.”

Section 3.5, “Program Evaluation,” of the OPPD CFH Training and Retraining Program states, in part: “These assessments will also evaluate applicability of industry operating experience, regulations, and quality assurance requirements.”

Provide additional information regarding whether changes to the facility, procedures, regulations, and quality assurance requirements will be included in the periodic evaluation of the OPPD CFH Training and Retraining Program at FCS and revision thereof, as appropriate.

Provide replacement page(s) for the OPPD CFH Training and Retraining Program reflecting any changes made to the document, in response to this RAI, as necessary.

SUBJECT: FORT CALHOUN STATION, UNIT NO. 1 – REQUEST FOR ADDITIONAL INFORMATION RE: CERTIFIED FUEL HANDLER TRAINING PROGRAM (CAC NO. MF8112) DATED MARCH 15, 2017

DISTRIBUTION:

PUBLIC
 LSPB R/F
 RidsACRS_MailCTR Resource
 RidsNrrDorl Resource
 RidsNrrDraAphb Resource
 RidsNrrLAIbetts Resource
 RidsNrrLAJBurkhardt Resource
 RidsNrrPMFortCalhoun Resource
 RidsRgn4MailCenter Resource
 VHuckabay, NRR/DRA

ADAMS Accession No.: ML17067A386

*via memo

OFFICE	NRR/DORL/LSPB/PM	NRR/DORL/LSPB/LAiT	NRR/DORL/LSPB/LA
NAME	JKim	IBetts	JBurkhardt
DATE	3/10/17	3/9/17	3/10/17
OFFICE	NRR/DRA/AHPB/BC*	NRR/DORL/LSPB/BC	NRR/DORL/LSPB/PM
NAME	SWeerakkody	DBroaddus	JKim
DATE	3/07/17	3/14/17	3/15/17

OFFICIAL RECORD COPY