Omaha Public Power District

LIC-17-0048
April 27, 2017

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

Fort Calhoun Station (FCS), Unit 1
Renewed Facility Operating License No. DPR-40
NRC Docket No. 50-285

Subject: Response to Request for Additional Information Regarding the Fort Calhoun Station Request to Revise Technical Specifications to Align Staffing Requirements for Permanently Defueled Condition (CAC NO. MF8437)

References:

1. Letter from OPPD (S. Marik) to USNRC (Document Control Desk), "License Amendment Request (LAR) 16-03: "Revised Fort Calhoun Station Technical Specifications to Align Staffing Requirements to Those Required for Decommissioning," dated September 28, 2016 (LIC-16-0092) (ML16273A502)
2. EMAIL from NRC (J. Kim) to OPPD (E. Matzke), "Request for Additional Information Regarding the Fort Calhoun Station Request to Revise Technical Specifications to Align Staffing Requirements for Permanently Defueled Condition (CAC NO. MF8437)", dated March 31, 2017 (ML 17090A394)

By letter dated September 28, 2016 (Reference 1), the Omaha Public Power District (OPPD) proposed an amendment to Renewed Facility Operating License No. DPR-40 for the Fort Calhoun Station (FCS). The proposed amendment would revise the administrative and staffing requirements for the permanently defueled condition. Specifically, the proposed changes would revise the technical specifications (TS) sections associated with operations staffing, training, and administrative requirements associated with the Certified Fuel Handler (CFH) program, and align the staffing and administrative requirements to that of a permanently defueled station.

On March 31, 2017 (Reference 2), the NRC provided OPPD with Requests for Additional Information (RAI) regarding the proposed technical administrative changes. Attachment 1 of this letter provides the responses to the RAI. Attachment 2 of this letter provides an updated "redline" markup of the proposed changes to TS from Reference 1 resulting from the responses to the RAI. Attachment 3 of this letter provides the "clean" markup of the proposed changes. This proposed change has been reviewed and approved the station's plant operations review committee (PORC).

This letter contains no regulatory commitments.

If you should have any questions regarding this submittal or require additional information, please contact Mr. Bradley H. Blome – Director Licensing and Regulatory Assurance at (402) 533-7270.

Respectfully,

Mary J. Fisher
Senior Director - Decommissioning Fort Calhoun Station

MJF/dmp

Attachments: 1. Response to Request for Additional Information
2. Revised "Redline" License Amendment Request 16-03
3. "Clean" Markup of Technical Specifications

c: K. M. Kennedy, NRC Regional Administrator, Region IV
J. Kim, NRC Project Manager
S. M. Schneider, NRC Senior Resident Inspector
Director of Consumer Health Services, Department of Regulation and Licensure, Nebraska Health and Human Services, State of Nebraska

ATTACHMENT 1

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING

THE FORT CALHOUN STATION

REQUEST TO REVISE TECHNICAL SPECIFICATIONS TO ALIGN STAFFING REQUIREMENTS FOR PERMANENTLY DEFUELED CONDITION (CAC NO. MF8437)

The previous submitted changes associated with the Fort Calhoun Station (FCS) licensed amendment request (LAR) are highlighted in "grey" to provide an aid in review of the newly proposed changes.

1. ***In Technical Specifications (TS) Section "Definitions" the proposed definition for a Non-Certified Operator (NCO) states: "A NON-CERTIFIED OPERATOR is an individual who complies with the provisions of the NCO training program required by TS 5.3.1."***

   The NRC staff notes that TS 5.3.1 does not expressly address the NCO training program or describe its requirements. Provide information regarding whether NCO is a non-licensed operator and clarify the applicability of TS 5.3.1 requirements to the NCO qualification.

RAI-1 OPPD response:

The proposed use of the term "Non-Certified Operator (NCO)" is an administrative change to the qualification description associated with the term "non-licensed operator (NLO)", used in the present technical specifications (TS). This term is proposed to be used in Definitions and in TS Table 5.2-1. The proposed use of this term more correctly describes the combined equipment operator position (CEO). It separates the non-licensed Certified Fuel Handler (CFH) from the non-licensed CEO, and implements industry accepted verbiage for the NCO qualification for stations that have permanently ceased power operations. The NCO will be able to fulfill the role of manipulating plant equipment and performing tasks as assigned by the CFH.

A correction is being made to this definition to identify the appropriate branching sections listed for the station's training requirements. The correct TS sections for training requirements are 5.4.1 and 5.4.2, not 5.3.1 and 5.3.2 as previously submitted.

The proposed changes to the definition wording is as follows:

"Certified Fuel Handler (CFH)

A CERTIFIED FUEL HANDLER is an individual who complies with provisions of the CERTIFIED FUEL HANDLER ~~CFH~~ training program required by ~~TS~~ Technical Specification 5.4.2 ~~5.3.2~~."

"Non-Certified Operator (NCO)

A NON-CERTIFIED OPERATOR is a non-licensed operator ~~an individual~~ who complies with the applicable ~~provisions of the NCO training program required by~~ training requirements of ~~TS~~ Technical Specification 5.4.1~~5.3.1~~, but is not a CERTIFIED FUEL HANDLER."

The definitions are proposed to be added by this LAR to clarify the training requirements and staff descriptions remaining at FCS as a permanently defueled facility, and to ensure the added term is clearly identified. The position's training program will continue to comply, as applicable to a permanently defueled station, with the requirements of ANSI/ANS 3.1-1993; "The systematic approach to training (SAT) process described in 6.2.1 shall be used to establish and maintain training programs....".

The training program description for the NCO is located in the following FCS documents:
1. TQ-FC-FC-201-1007, SAFESTOR NCO Training Program Description (Reference 1)
2. TQ-DC-FC-201-1000, SAFSTOR Training Program Description, Section 5.7 (Reference 2)
3. TQ-DC-FC-201, SAFSTOR Systematic Approach to Training (SAT) (Reference 3)

The process for implementing a SAT during the decommissioning period are outlined in the FCS training program description (TPD). The TPDs were developed to ensure the SAT process per 10 CFR 50.120 is used to develop a job analysis and task analysis for each decommissioning position, including the NCO. This training will include the appropriate level of rigor (classroom, plant walkdowns, On the Job Training / Task Performance Evaluations, etc.) based on the analysis.

A gap/transition analysis was conducted to ensure current operators staying on for the decommissioning period will have the required knowledge and skill to perform the decommissioning job duties. Any gaps identified will receive the appropriate training to close the gap prior to standing the applicable watch station.

This change is consistent with referenced plant Fitzpatrick (Reference 7).

For selection of personnel for the NCO position the requirements will continue to complying with the requirements of ANSI/ANS N18.1-1971, Section 3.2.4, Operators-Technicians-Repairmen: "Operators, technicians, and repairmen are persons principally involved in the manipulation of plant controls, monitoring of instrumentation, or the operation of equipment".

ANSI/ANS N18.1-1971 Section 4.5.1, Operators-Technicians-Repairmen Personnel, establishes the qualification requirements for non-licensed operators. For FCS, these requirements are as follows:
1. High school diploma or equivalent
2. Possess a high degree of manual dexterity and mature judgment
3. Selection interviews and examinations should be used for all operators to aid in determining individual ability to progress to high levels of responsibility

Definition change basis: The definition will be added to provide consistent differentiation between the non-license training programs associated with the CFH and the NCO. This definition provides a clear delimitation between the two non-licensed programs. The addition of the definitions is considered an administrative change and does not affect the technical content or requirements of the TS.

The change also corrected the branching sections applicable to these standards. This was an administrative error and will be corrected to ensure the branching to the correct standard sections are referenced.

2. ***The current TS 5.2.1 states: "Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant."***
The proposed TS 5.2.1 states: "Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear fuel." Further, the proposed TS 5.2.1.b states, in part: "The plant manager shall be responsible for overall unit safe operation…"

a. Clarify why the proposed TS 5.2.1 continues to refer to "unit operation," and does not reflect the change in safety concerns from an operating plant to a permanently defueled facility.
b. The proposed change to TS 5.2.1 involves replacing "nuclear power plant" with "nuclear fuel." Section 3.0, "Technical Evaluation," of the Enclosure to the OPPD's letter dated September 28, 2016, does not describe the basis for the proposed change. Provide additional information describing the change basis for the proposed change to TS 5.2.1.

RAI-2 (a) OPPD Response:

The use of "Operation" and "operating" was considered a general use term for controlling and maintaining a facility, not specifically associated with the use of the reactor to create power. However, a change to this wording will remove any confusion with the intent of use of the facility and to provide consistency. The proposed re-wording of the TS sections are as follows:

"5.2.1 Onsite and offsite organizations shall be established for the facility ~~unit operation~~ and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear fuel ~~power plant~~.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all ~~operating~~ organization positions. These relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the USAR.

b. The plant manager shall be responsible for the overall facility ~~unit safe operation~~ and shall have control over those onsite activities necessary for safe storage ~~operation~~ and maintenance of the nuclear fuel ~~plant~~."

c. The corporate officer with responsibility for overall management of ~~plant~~ nuclear ~~safety~~ fuel shall take any measures needed to ensure acceptable performance of the staff in controlling ~~operating~~, maintaining, and providing technical support to the facility ~~plant~~ to ensure safe management of nuclear fuel ~~safety~~.

d. The individuals who train the ~~operating staff~~ CERTIFIED FUEL HANDLERS and NON-CERTIFIED OPERATORS, and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient

organizational freedom to ensure their ability to perform their assigned functions ~~independence from operating pressures~~.

For consistency, Section 5.1.1 is also proposed to include an administrative revision by adding the term "the" to correct the missing possessive term in the sentence and a remove the term "operation". The proposed mark-up is as follows:

"5.1.1 The plant manager shall be responsible for the overall facility ~~operation~~, and shall delegate in writing the succession to this responsibility during his absence."

Section 5.1.1 change basis: Responsibility, establishes the requirements for the Plant Manager. A change to the description of the facility is proposed to add the word "the" and remove the term "operation". This change aligns the requirements of this section with those of a permanently defueled facility. Since the FCS license no longer authorizes use of the facility for power operation or emplacement or retention of fuel into the reactor vessel as provided in 10 CFR Part 50.82(a)(2), this change will provide a more accurate description of the station's condition.

RAI-2 (b) OPPD Response:

The following provides an update to the change basis discussion provided for the proposed changes.

Section 5.2.1 change basis: Organization, establishes the requirements for plant lines of authority. A change to the description of the facility is proposed to replace the term "unit operation" with "facility" and "power plant" with "fuel". Since the FCS license no longer authorizes use of the facility for power operation or emplacement or retention of fuel into the reactor vessel as provided in 10 CFR Part 50.82(a)(2), this change will provide a more accurate description of the station's condition.

Section 5.2.1 (a) through (c) change basis: Organization, establishes the requirements for plant lines of authority. A change to the description of the organization positions is proposed to remove or replace the terms "operating" and "operation". Since the FCS license no longer authorizes use of the facility for power operation or emplacement or retention of fuel into the reactor vessel as provided in 10 CFR Part 50.82(a)(2), this change will provide a more accurate description of the station's condition.

Section 5.2.1 (d) change basis: Organization, establishes the requirements for plant lines of authority. The use of "operating staff" will be replaced with "certified fuel handler and non-certified operator" to more accurately specify the personnel qualifications that the program is being provided for, in the permanently defueled condition. Since the FCS license no longer authorizes use of the facility for power operation or emplacement or retention of fuel into the reactor vessel as provided in 10 CFR Part 50.82(a)(2), this proposed change will provide a more accurate description of the personnel's qualifications. This is an administrative change and does not affect the technical content or requirements of TS.

3. ***The current TS 5.2.1.c, states: "The corporate officer with responsibility for overall plant nuclear safety shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety." The proposed TS 5.2.1.c states: "The corporate officer with responsibility for overall management of nuclear fuel shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure safe management of nuclear fuel."***

   Clarify why the proposed TS 5.2.1.c continues to use the term "plant," and does not reflect the change in safety concerns from an operating plant to a permanently defueled facility. The same question also applies to TS 5.2.2, which refers to the "plant staff organization;" TS 5.3.1, which refers to the "plant staff;" TS 5.4.1, which refers to the "plant staff," and TS 5.8.2.b, which refers to the "plant supervisory staff."

RAI-3 OPPD Response:

The use of "plant" was considered a general use term for the remaining systems structures and components (SSC) at the facility, and not specifically associated with the use of the reactor to create power. The use of the term was also not specifically tied to safety related SSC or requirement previously associated with an operating reactor. However, a change to this wording will remove any confusion with the intent in the use of the facility and to provide consistency. FCS is proposing to change the term "plant" to "facility" and "operating" with "controlling" to ensure a clear understanding that the facility is in a permanently defueled conditions that will no longer produce power.

The proposed re-wording of the TS sections are as follows:

The proposed change to section 5.2.1(c) to replace the term "operating" with "controlling" is located in the RAI-2 response.

The proposed change to section 5.4.1 to replace the term "plant" with "facility" is located in the RAI-4 response.

The proposed change will remove references to "plant" and replace them with "facility" from section 5.8.2(b) is shown below:

"5.8.2

b. The change is approved by two members of the ~~plant~~ facility supervisory staff, at least one of whom is qualified as a CERTIFIED FUEL HANDLER. ~~holds a Senior Reactor Operator's License~~"

The proposed change will remove references to "plant" and replace them with "facility" from section 5.2.2 is shown below.

"5.2.2 Facility ~~Plant~~ Staff

The facility ~~plant~~ staff organization shall be as described in Chapter 12 of the USAR and shall function as follows:"

The proposed change to section 5.3.1 to replace the term "plant" with "facility" is shown below:

5.3.1

"Each member of the facility ~~plant~~ staff shall meet or exceed the minimum qualifications of ANSI/AN N18.1-1971 for comparable positions, with the exception of the Manager - Radiation Protection (MRP) ~~and the Shift Technical Advisor (STA), the senior reactor operator licensees, and the reactor operator licensees~~, who shall meet the requirements set forth in Regulatory Guide 1.8, Revision 3, dated May 2000, entitled "Qualification and Training of Personnel for Nuclear Power Plants."

Sections 5.2.1(c), 5.3.1, 5.4.1, 5.8.2(b), 5.2.2 change basis: A change to the description of the facility is proposed to replace the term "plant" with "facility" to use a term that will clarify the station is permanently defueled facility, and also the use of "operating" will be replaced with "controlling" to prevent confusion with the intent of manipulation of station equipment in the permanently defueled condition. Since the FCS license no longer authorizes use of the facility for power operation or emplacement or retention of fuel into the reactor vessel as provided in 10 CFR Part 50.82(a)(2), this change will provide a more accurate description of the station's condition. This is an administrative change and does not affect the technical content or requirements of TS.

4. ***The proposed TS 5.2.1.d states, in part: "The individuals who train the operating staff…may report to the appropriate onsite manager…" The basis for proposed changes to TS 5.2.1.d states, in part: "Changes to this section provides more consistent terminology reflecting the post defueled condition."***

   Clarify why the proposed TS 5.2.1.d continues to refer to the "operating staff," as opposed to identifying the specific positions to which this requirement will apply (such as, for example, only Certified Fuel Handlers, or all non-licensed operators.)

RAI-4 OPPD Response:

The use of "operating" as it applied to station staffing was considered a general use term for controlling and maintaining a facility, not specifically associated with the use of the reactor to create power. However, a change to this wording will remove any confusion with the intent in use of the facility and to provide consistency. The proposed change to the section provides a more consistent description of the individual positions remaining at the facility and removes the term "operating" from the staff title and replace it with the remaining titles specific to the associated positions:

The proposed markup and change basis is included in the RAI-2 response.

The following sections are also associated with training, and will be changed to ensure verbiage is consistent with a permanently defueled facility:

"5.4 Training

5.4.1 A retraining and replacement training program for the facility ~~plant~~ staff shall be maintained under the direction of the Plant Manager or designee ~~Training~~ and shall meet or exceed the requirements of Section 6 of ANSI/ANS 3.1-1993, as modified by Regulatory Guide 1.8, Revision 3, dated May 2000 and 10 CFR Part 50.120~~55~~."

5.4.2 A NRC approved training and retraining program for the CERTIFIED FUEL HANDLER shall be maintained.

Section 5.4.1 and 5.4.2 change basis: Training, establishes the requirements for training of facility staff. The proposed change to this section replaces the requirements of the responsible manager from the "Manager Training" to the "Plant Manager or designee" to more closely reflect the remaining station staff in the defueled condition. It also replaces the listed 10 CFR associated with the training program, to more accurately reflect the requirements of the proposed CFH training program. The inclusion of the CFH training program to this section provides a cohesive grouping of similar topics. This change will remove the previous request to add this requirement to sections 5.3.1 and 5.3.2. This was an administrative error and is corrected to branch to the appropriate section. Since the FCS license no longer authorizes use of the facility for power operation or emplacement or retention of fuel into the reactor vessel as provided in 10 CFR Part 50.82(a)(2), this change will provide more appropriate requirements that coincides with the station's condition and staffing.

5. ***The proposed TS 5.2.2 states, in part: "The plant staff organization shall be as described in Chapter 12 of the USAR..." USAR Chapter 12.1, "Organization and Responsibility," Revision 20, discusses manning the operating shift with Senior Reactor Operators and Reactor Operators, among other positions, which are proposed to be removed in the proposed TS for the permanently defueled condition.***

   Clarify the apparent inconsistency between the proposed TS 5.2.2 and Chapter 12 of the USAR.

RAI-5 OPPD Response:

The change to updated safety analysis report (USAR) Section 12.1, Organization and Responsibility, as well as other USAR sections and associated documents, will reflect the change in requirements from the proposed LAR and will be completed as part of the safety evaluation report (SER) implementation in accordance with station procedural guidance. The change to the final safety analysis report (FSAR) as updated will be submitted to the NRC as required under 10 CFR 50.4 and 10 CFR 50.71(e).

6. ***The proposed TS 5.2.2.b states: "An individual qualified in Radiation Protection Procedures shall be onsite during fuel handling operations or movement over storage racks containing fuel."***

   Provide additional information regarding whether the position described in TS 5.2.2.b can be vacant, in order to provide for unexpected absence of personnel, similar to the provisions found in the proposed Table 5.2.-1, "Minimum Shift Crew Composition," Note (ii).

RAI-6 OPPD Response:

The provision proposed in the TS change to allow fuel handling operations or movement over storage racks with the individual qualified in radiation protection procedures absent from site is being provided in the revised section. The intent is to limit this time period to as short of time as possible without a qualified person available. If an unexpected absence is encountered, the activities described in this section will continue, not to exceed the limited period of absence, until this position is again staffed. A clarification to this intent is being added to this section, as shown below:

"5.2.2

b. An individual ~~Operator or Technician~~ qualified in Radiation Protection Procedures shall be onsite ~~when fuel is in the reactor~~ during fuel handling ~~operations~~ or movement over storage racks containing fuel. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position."

Section 5.2.2(b) change basis: Plant Staff, establishes the requirements for personnel at the station. A proposed addition to this section will add requirements for the individual qualified in radiation protection procedures to be onsite during fuel movement whenever fuel handling operation or movement over storage racks containing fuel, with the added exception that allows for a short duration absence.

The two (2) hour absence period to establish minimum shift staffing for this position, although not contained in the current FCS TS, includes the staffing requirements specific to fuel and load handling operations. With the permanent removal of fuel from the reactor vessel, the probability and severity of postulated accidents are greatly reduced. The postulated accidents analyzed in USAR Chapter 14 are no longer credible, with the exception of the fuel handling accident (FHA) in the auxiliary building. Due to this reduced risk, the proposed TS controls will provide an appropriate level of governance of the fuel and load handling over fuel. Although FCS is not committed to use standard technical specifications (STS), it provides examples of this absence provision, and is being used only as a comparison. The proposed changes, in combination with the changes to Table 5.2.-1 items i and ii (shown in RAI-10 of this attachment), are sufficient to assure the safe handling and storage of nuclear fuel and are consistent with NUREG-1432, Standard Technical Specifications – Combustion Engineering Plants (Reference 4) and requirements for permanently shutdown sites such as Fitzpatrick, (Reference 5), SONGS (Reference 9) and Kewaunee Power Station (KPS) (Reference 8).

7. The proposed TS 5.2.2.c states: "The Shift Manager shall be a CERTIFIED FUEL HANDLER." The basis for the proposed changes to TS 5.2.2.c states, in part: "This section is being revised to reflect the qualification requirements for fuel movement Shift Manager it removes the requirement for the supervision of fuel handling to have an SRO."

The abovementioned statement in the basis for the proposed changes to TS 5.2.2.c is unclear; provide additional information clarifying the intent of the statement. Furthermore, provide additional information regarding whether the Shift Manager will be responsible for the shift command function.

RAI-7 OPPD Response:

The following provides an update to the TS change basis discussion for the proposed changes:

Section 5.2.2 (c) change basis: Plant Staff, establishes the requirements for personnel at the station. The Shift Manager (SM) will no longer be a NRC licensed Senior Reactor Operator (SRO), this position will instead require qualification as a CFH. The qualification of the SM associated with the CFH program establishes the requirements for staff having oversite of fuel handling operations and shift management responsibilities. All staff qualified as CFH will have completed training in the safe conduct of decommissioning activities, safe handling and storage of spent fuel, and the appropriate response to plant emergencies. This addition reflects the requirements from previous sections being revised by this amendment, and ensures responsibility for fuel movement and station control is maintained by a supervisory staff member qualified under the facility supervisory requirements and the CFH training program. The addition of this training requirement does not affect the remaining shift command function provided as part the SM duties associated with a decommissioning facility. This is consistent with the remaining requirements with the submittal of the certification of permanent removal of fuel from the reactor vessel under 10 CFR 50.82(a)(2), 10 CFR 50.54(m), and the license amendment request under review in this amendment.

This change also removes the reference to fuel movement in the core and deletes the requirements for the fuel handling supervisor to have a SRO or SRO-limited to fuel handling. With the submittal of the certification of permanent removal of fuel from the reactor vessel under 10 CFR 50.82(a)(2), 10 CFR 50.54(m), and the license amendment request under review in this amendment, FCS will no longer utilize operators with licenses nor will it emplace fuel in the core. Therefore, the requirements associated with core alternations is no longer needed.

Although not required as part of the present FCS TS, an addition to section 5.1 is being proposed to add section 5.1.2 in response to this RAI to clarify the SM responsibilities associated with the shift command function, as follows:

"5.1.2

The Shift Manager shall be responsible for the shift command function."

Section 5.1.2 change basis: Responsibility, establishes the requirements for the station management. This section is being added to identify the SM as having the command function of the shift. Although FCS is not a STS plant, a comparison of NUREG-1432, Standard Technical Specifications Combustion Engineering Plants (STS) (Reference 4) provided examples of the use

of this requirement. The STS states "The [Shift Supervisor (SS)] shall be responsible for the control room command function." The FCS TS will only use the portion of this section that is applicable to a defueled station, because safe operation in the permanently defueled condition consists primarily of ensuring safe management of the spent irradiated fuel that is stored onsite. Associated activities (e.g., fuel handling) do not necessarily rely on the main control room (MCR). The MCR will remain the physical center of the command function; however, since control of activities may be performed either remotely from the MCR or locally in the facility, the location of the command center is functionally where the SM is located. The proposed TS change recognizes that the delegation of authority for command and control aspects is different in a permanently shutdown and defueled plant from that for an operating plant when the SM leaves the MCR as stated in STS. With FCS in the permanently defueled condition, with fuel in the Spent Fuel Pool (SFP), the number of relevant controls located in the MCR and the gradual nature of abnormal or accident situations (i.e., fuel handing accident, postulated liquid waste system leak) would not warrant that the command function remain in the MCR at all times. Adequate communications capability is provided to allow operators and plant personnel to safely manage storage and handling of irradiated fuel without reliance on the MCR for the command function. This is consistent with the remaining requirements associated with the submittal of the certification of permanent removal of fuel from the reactor vessel under 10 CFR 50.82(a)(2), 10 CFR 50.54(m), and the LAR under review in this amendment. This addition is also consistent with referenced plants including Fitzpatrick (Reference 5) and Oyster Creek (Reference 10).

8. ***The proposed TS 5.2.2.d states: "Fire protection program responsibilities are assigned to those positions and/or groups designated by asterisks in USAR 12.1-1 through 12.1-4 according to the procedures specified in Section 5.8 of the Technical Specifications." USAR Figure 12.1-1, Revision 20; Figure 12.1-2, Revision 23; Figure 12.1-3, Revision 19, and Figure 12.1-4 Revision 20, include positions which are proposed to be removed in the proposed TS for the permanently defueled condition.***

   Clarify the apparent inconsistency between the proposed TS 5.2.2.d and Figures 12.1-1 through 12.1-4 of the USAR.

RAI-8 OPPD Response:

The change to USAR Section 12.1, Organization and Responsibility, as well as other USAR sections and associated documents, will reflect the change in requirements from the proposed LAR and will be completed as part of the SER implementation in accordance with station procedural guidance. The change to the FSAR as updated will be submitted to the NRC as required under 10 CFR 50.4 and 10 CFR 50.71(e).

9. ***The proposed Table 5.2-1, "Minimum Shift Crew Composition," includes the column titled "License Category," which lists a Certified Fuel Handler and a Non-Certified Operator. The NRC staff notes that both the Certified Fuel Handler and a Non-Certified Operator are non-licensed operators.***

   Clarify the use of the "License Category" terminology, as used in the proposed Table 5.2-1.

RAI-9 OPPD Response:

Although the use of the term is consistent with the present license (the previous use included non-licensed operators and shift technical advisors), it is recognized that the header, as is, could cause confusion as to its intent. Therefore, a change to the header title of Table 5.2-1 is proposed as follows:

~~License~~ Staffing Category

Table 5.2-1 change basis: Minimum Shift Crew Composition, establishes the minimum staff required to be onsite. A proposed change to the column title will remove the use of a possibly confusing term associated with the facility staff. This is an administrative change and does not change the technical content of the table.

10. The proposed Table 5.2-1, "Minimum Shift Crew Composition," Note (ii), states: "Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 5.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewmember being late or absent."

Provide additional information regarding whether any shift crew position is permitted to be unmanned while fuel movements are in progress or movement of loads over fuel are in progress.

RAI-10 OPPD Response:

The absence of the minimum crew composition is not meant to extend to that of the CFH supervising fuel handling activities or movement of loads over fuel or the credited NCO during these activities. A clarification to this section is proposed to be added to ensure the intent of this requirements is clearly provided:

Table 5.2-1 Notes;

(i) This includes the individual with a CERTIFIED FUEL HANDLER qualification ~~Senior Operator License~~ supervising fuel handling operations ~~Core Alterations~~

(ii) Shift crew composition may be ~~one~~ less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 5.2-1, provided no fuel handling operations or movement of loads over fuel storage racks is in progress. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewmember being late or absent.

Table 5.2-1 note change basis: Plant Staff, establishes the requirements for personnel at the station. The proposed change to this section will add requirements for a CFH and a NCO to be onsite whenever fuel handling operations or movement over storage racks containing fuel is in progress. It also provides restriction of fuel and load movement over fuel during shift absences. With the plant in a permanently defueled state the postulated accidents analyzed in USAR Chapter 14 are no longer credible, with the exception of the FHA in the auxiliary building. This addition provides assurance that oversite is available during this activity and in the unlikely case of a FHA. This change is consistent with other referenced plants including Fitzpatrick (References 6 and 7).

11. The current TS 5.8.1 states, in part: "Written procedures and administrative policies shall be established, implemented and maintained covering the following activities: <...>
b. The emergency operating procedures required to implement the requirements of NUREG-0737 and to NUREG-0737, Supplement 1, as stated in Generic Letter 82-33."
The proposed TS 5.8.1.b remains unchanged.

Provide additional information regarding the applicability of TS 5.8.1.b to the facility in a permanently defueled condition.

RAI-11 OPPD Response:

OPPD agrees this section is no longer required at a permanently defueled plant.
The proposed change will now read:

b. DELETED ~~The emergency operating procedures required to implement the requirements of NUREG-0737 and to NUREG-0737, Supplement 1, as stated in Generic Letter 82-33~~;

5.8.1(b) change basis: Procedures, this section is associated with maintenance of the emergency operating procedures (EOP) that implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33. NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980 (ML 051400209), and NUREG-0737, Supplement 1, "Clarification of TMI Action Plan Requirements: Requirements for Emergency Response Capability," January 1983 (ML 102560009), as stated in Generic Letter 82-33, "Supplement 1 to NUREG-0737 - Emergency Response Capabilities," dated December 17, 1982 (ML 031080548), incorporated into one document all Three Mile Island (TMI) related items approved for implementation by the commission at that time. This included the use of human factored, function oriented, emergency operating procedures to improve human reliability and the ability to mitigate the consequences of a broad range of initiating events for operating reactors, and subsequent multiple failures or operator errors, without the need to diagnose specific events (i.e. Regulatory Guide 1.76, 1.78, 10 CFR 50.63, etc.).

This section is proposed for deletion in its entirety, because the EOP discussed therein only pertain to accidents and events resulting from reactor operation. With this change the requirements to maintain the station documents associated with these commitments, including the station's EOP, are removed. With the plant in a permanently defueled state the postulated accidents analyzed in FCS USAR Chapter 14 are no longer credible, with the exception of the FHA in the auxiliary building, as well as other non-Chapter 14 EOP events implemented by NUREG-0737 that are no longer required (i.e. Station Blackout, etc.). Since the FCS license no longer authorizes use of the facility for power operation or emplacement or retention of fuel into the reactor vessel as provided in 10 CFR Part 50.82(a)(2), this section is no longer required for the safe storage or movement of irradiated fuel. This change is consistent with that approved for Fitzpatrick (Reference 6) Kewaunee Power Station (Reference 8).

12. TS Section 5.0 – page 5 included in the License Amendment Request (LAR) submitted by letter dated September 28, 2016 shows the changes marked on the page was that last updated by Amendment No. 259. The NRC staff notes that the most recent version of this page was last updated by Amendment No. 275, which was issued on June 16, 2014 (ADAMS Accession Number ML14098A092). The NRC staff further notes that Amendment No. 275 replaced the statement in TS 5.8.1.c with "Not used."

Clarify the apparent discrepancy in the version control of TS 5.0 – Page 5 submitted in the LAR and incorporate appropriate changes, as needed.

RAI-12 OPPD Response:

This was an administrative oversight, the pages are updated and attached in Attachment 2 and 3 of this document.

REFERENCES

1. TQ-FC-FC-201-1007, SAFESTOR NCO Training Program Description

2. TQ-DC-FC-201-1000, SAFSTOR Training Program Description

3. TQ-DC-FC-201, SAFSTOR Systematic Approach to Training (SAT)

4. NUREG 1432, Standard Technical Specifications Combustion Engineering Plants, Revision 4

5. License Amendment Request - "Revision to Technical Specification Administrative Controls for Permanently Defueled Condition James A. FitzPatrick Nuclear Power Plant Docket No. 50-333 License No. DPR-059," dated January 15, 2016 (ML 16015A456)

6. Entergy letter - "Fitzpatrick - 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," dated June 3, 2016 (ML 16155A326)

7. Entergy letter - "Fitzpatrick - Revision to Technical Specification (TS) Administrative Controls for Staffing and Training upon Permanent Cessation of Operation (CAC No. MF7280) — Supplement 2," dated September 19, 2016 (ML 16263A237)

8. Letter - USNRC to Dominion Energy Kewanee, Inc., Kewaunee Power Station - Issuance of Amendment for Permanently Shutdown and Defueled Technical Specifications and Certain License Conditions (TAC No. MF1952)," dated February 13, 2015 (ML 14237A045)

9. License Amendment Request - "San Onofre Nuclear Generating Station, Units 2 and 3 Amendment Applications 266 and 251 Permanently Defueled Technical Specifications," dated April 11, 2014 (ML 14085A141)

10. License Amendment Request - "Oyster Creek Nuclear Generating Station for Proposed Change to Technical Specifications Section 6.0 Administrative Controls for Permanently Defueled Condition," dated May 17, 2106 (ML 16138A129)

ATTACHMENT 2

REVISED "REDLINE" LICENSE AMENDMENT REQUEST 16-03
Revision 1

OMAHA PUBLIC POWER DISTRICT
FORT CALHOUN STATION. UNIT NO. 1
DOCKET NO. 50-285

Certified Fuel Handler (CFH)

A CERTIFIED FUEL HANDLER is an individual who complies with provisions of the CERTIFIED FUEL HANDLER training program required by Technical Specification 5.4.2.

Core Alteration

The movement or manipulation of fuel, sources, reactivity control components, or other components affecting reactivity within the reactor pressure vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATION shall not preclude completion of movement of a component to a safe, conservative position.

Equivalent Full Power Day (EFPD)

The time interval during power operation when the heat generated by the reactor is equivalent to reactor operation at 100% of rated power for 24 hours.

Non-Certified Operator (NCO)

A NON-CERTIFIED OPERATOR is a non-licensed operator who complies with the applicable training requirements of Technical Specification 5.4.1, but is not a CERTIFIED FUEL HANDLER.

Shutdown Margin

Shutdown Margin shall be the amount of reactivity by which:

(1) the reactor is subcritical; or

(2) the instantaneous amount of reactivity by which the reactor would be subcritical from its present condition assuming:

a. All known trippable full length control element assemblies (shutdown and regulating) are fully inserted except for the single assembly of highest reactivity worth which is assumed to be fully withdrawn, and

b. No change in non trippable control element assembly position.

Axial Shape Index

The external AXIAL SHAPE INDEX (YE) is the power level detected by the lower excore nuclear instrument detectors (L) less the power level detected by the upper excore nuclear instrument detectors (U) divided by the sum of these power levels. The internal AXIAL SHAPE INDEX (YI) used for the trip and pre-trip signals in the reactor protection system is the above value (YE) modified by the shape annealing factor, SAF, and a constant, B, to determine the true core axial power distribution for that channel.

$$Y_E = \frac{L-U}{L+U} \qquad Y_I = SAF \times Y_E + B$$

Azimuthal Power Tilt - T_q

Azimuthal Power Tilt shall be the power asymmetry between azimuthally symmetric fuel assemblies.

Maximum Radial Peaking Factor (F_R^T)

The Maximum Radial Peaking Factor is the maximum ratio of the individual fuel pin power to the core average pin power integrated over the total core height, including tilt. The F_R^T limit is provided in the Core Operating Limits Report.

Dose Equivalent I-131

That concentration of I-131 (ΦCi/gm) which alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134 and I-135 actually present. In other words,

Dose Equivalent I-131 (ΦCi/gm)	=	ΦCi/gm of I-131
	+	0.0361 x ΦCi/gm of I-132
	+	0.270 x ΦCi/gm of I-133
	+	0.0169 x ΦCi/gm of I-134
	+	0.0838 x ΦCi/gm of I-135

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The plant manager shall be responsible for the overall facility ~~operation~~, and shall delegate in writing the succession to this responsibility during his absence.

5.1.2 The Shift Manager shall be responsible for the shift command function.

5.2 Organization

5.2.1 Onsite and offsite organizations shall be established for the facility ~~unit operation~~ and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear fuel ~~power plant~~.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all ~~operating~~ organization positions. These relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the USAR.

b. The plant manager shall be responsible for the overall facility ~~unit safe operation~~ and shall have control over those onsite activities necessary for safe storage ~~operation~~ and maintenance of the nuclear fuel ~~plant~~.

c. The corporate officer with responsibility for overall management of ~~plant~~ nuclear ~~safety~~ fuel shall take any measures needed to ensure acceptable performance of the staff in controlling ~~operating~~, maintaining, and providing technical support to the facility ~~plant~~ to ensure safe management of nuclear fuel ~~safety~~.

d. The individuals who train the ~~operating staff~~ CERTIFIED FUEL HANDLERS and NON-CERTIFIED OPERATORS, and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their ability to perform their assigned functions ~~independence from operating pressures~~.

5.2.2 Facility ~~Plant~~ Staff

The facility ~~plant~~ staff organization shall be as described in Chapter 12 of the USAR and shall function as follows:

a. The minimum number and type of ~~licensed and unlicensed operating~~ personnel required onsite for each shift shall be as shown in Table 5.2-1.

5.2 Organization (Continued)

b. An individual ~~Operator or Technician~~ qualified in Radiation Protection Procedures shall be onsite ~~when fuel is in the reactor~~ during fuel handling operations or movement over storage racks containing fuel. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

c. The Shift Manager shall be a CERTIFIED FUEL HANDLER. ~~All core alterations shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator limited to fuel handling who has no other concurrent responsibilities during the operation.~~

d. Fire protection program responsibilities are assigned to those positions and/or groups designated by asterisks in USAR 12.1-1 through 12.1-4 according to the procedures specified in Section 5.8 of the Technical Specifications.

e. DELETED ~~The Manager - Shift Operations, the Shift Managers, and the Unit Supervisors shall hold a senior reactor operator license. The Licensed Operators shall hold a reactor operator license.~~

5.3 Facility Staff Qualification

5.3.1 Each member of the facility ~~plant~~ staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, with the exception of the Manager - Radiation Protection (MRP) ~~and the Shift Technical Advisor (STA), the senior reactor operator licensees, and the reactor operator licensees~~, who shall meet the requirements set forth in Regulatory Guide 1.8, Revision 3, dated May 2000, entitled "Qualification and Training of Personnel for Nuclear Power Plants."

5.4 Training

5.4.1 A retraining and replacement training program for the facility ~~plant~~ staff shall be maintained under the direction of the Plant Manager or designee ~~Training~~ and shall meet or exceed the requirements of Section 6 of ANSI/ANS 3.1-1993, as modified by Regulatory Guide 1.8, Revision 3, dated May 2000 and 10 CFR Part 50.120 ~~55~~.

5.4.2 A NRC approved training and retraining program for the CERTIFIED FUEL HANDLER shall be maintained.

TABLE 5.2-1

MINIMUM SHIFT CREW COMPOSITION (ii, iii)

~~License~~Staffing Category	Minimum ~~Core~~ Staffing ~~Alteration~~	~~Cold Shutdown or Refueling Shutdown~~	~~Operating or Hot Shutdown Modes~~
CERTIFIED FUEL HANDLER			
~~Senior Operator License~~	1(i)	~~1~~	~~2(iii)~~
~~Operator License~~	~~2~~	~~1~~	~~2(iv)~~
~~Non-Licensed~~	1(iv) ~~(As required)~~	~~1~~	~~2~~
NON-CERTIFIED OPERATOR			
~~Shift Technical Advisor~~	~~None~~	~~None~~	~~1~~

(i) This includes the individual with a CERTIFIED FUEL HANDLER qualification ~~Senior Operator License~~ supervising fuel handling operations ~~Core Alterations~~.

(ii) Shift crew composition may be ~~one~~ less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 5.2-1 provided no fuel handling operations or movement over storage racks containing fuel is in progress. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewmember being late or absent.

(iii) At least one of these individuals must be in the control room at all times when fuel is in the Spent Fuel Pool.

(iv) The NON-CERTIFIED OPERATOR position may be filled by a CERTIFIED FUEL HANDLER. ~~At least one of these individuals (or the second senior licensed operator, if both senior licensed operators are in the control room) must be present at the controls at all times.~~

5.0 ADMINISTRATIVE CONTROLS

5.7 Not used.

5.8 Procedures

5.8.1 Written procedures and administrative policies shall be established, implemented and maintained covering the following activities:

a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, 1978;

b. DELETED ~~The emergency operating procedures required to implement the requirements of NUREG-0737 and to NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;~~

c. Not used

d. All programs specified in Specification 5.11 through 5.24.

5.8.2 Temporary changes to procedures of 5.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the ~~plant~~ facility supervisory staff, at least one of whom is qualified as a CERTIFIED FUEL HANDLER ~~holds a Senior Reactor Operator's License~~.

ATTACHMENT 3

"CLEAN" MARKUP OF TECHNICAL SPECIFICATIONS

OMAHA PUBLIC POWER DISTRICT
FORT CALHOUN STATION. UNIT NO. 1
DOCKET NO. 50-285

DEFINITIONS

Certified Fuel Handler (CFH)

A CERTIFIED FUEL HANDLER is an individual who complies with provisions of the CERTIFIED FUEL HANDLER training program required by Technical Specification 5.4.2.

Core Alteration

The movement or manipulation of fuel, sources, reactivity control components, or other components affecting reactivity within the reactor pressure vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATION shall not preclude completion of movement of a component to a safe, conservative position.

Equivalent Full Power Day (EFPD)

The time interval during power operation when the heat generated by the reactor is equivalent to reactor operation at 100% of rated power for 24 hours.

Non-Certified Operator (NCO)

A NON-CERTIFIED OPERATOR is a non-licensed operator who complies with the applicable training requirements of Technical Specification 5.4.1, but is not a CERTIFIED FUEL HANDLER.

Shutdown Margin

Shutdown Margin shall be the amount of reactivity by which:

(1) the reactor is subcritical; or

(2) the instantaneous amount of reactivity by which the reactor would be subcritical from its present condition assuming:

a. All known trippable full length control element assemblies (shutdown and regulating) are fully inserted except for the single assembly of highest reactivity worth which is assumed to be fully withdrawn, and

b. No change in non trippable control element assembly position.

DEFINITIONS

Axial Shape Index

The external AXIAL SHAPE INDEX (YE) is the power level detected by the lower excore nuclear instrument detectors (L) less the power level detected by the upper excore nuclear instrument detectors (U) divided by the sum of these power levels. The internal AXIAL SHAPE INDEX (YI) used for the trip and pre-trip signals in the reactor protection system is the above value (YE) modified by the shape annealing factor, SAF, and a constant, B, to determine the true core axial power distribution for that channel.

$$Y_E = \frac{L-U}{L+U} \qquad Y_I = SAF \times Y_E + B$$

Azimuthal Power Tilt - T_q

Azimuthal Power Tilt shall be the power asymmetry between azimuthally symmetric fuel assemblies.

Maximum Radial Peaking Factor (F_R^T)

The Maximum Radial Peaking Factor is the maximum ratio of the individual fuel pin power to the core average pin power integrated over the total core height, including tilt. The F_R^T limit is provided in the Core Operating Limits Report.

Dose Equivalent I-131

That concentration of I-131 (ΦCi/gm) which alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134 and I-135 actually present. In other words,

Dose Equivalent I-131 (ΦCi/gm)	=	ΦCi/gm of I-131
	+	0.0361 x ΦCi/gm of I-132
	+	0.270 x ΦCi/gm of I-133
	+	0.0169 x ΦCi/gm of I-134
	+	0.0838 x ΦCi/gm of I-135

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The plant manager shall be responsible for the overall facility, and shall delegate in writing the succession to this responsibility during his absence.

5.1.2 The Shift Manager shall be responsible for the shift command function.

5.2 Organization

5.2.1 Onsite and offsite organizations shall be established for the facility and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear fuel.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all organization positions. These relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the USAR.

b. The plant manager shall be responsible for the overall facility and shall have control over those onsite activities necessary for safe storage and maintenance of the nuclear fuel.

c. The corporate officer with responsibility for overall management of nuclear fuel shall take any measures needed to ensure acceptable performance of the staff in controlling, maintaining, and providing technical support to the facility to ensure safe management of nuclear fuel.

d. The individuals who train the CERTIFIED FUEL HANDLERS and NON-CERTIFIED OPERATORS, and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their ability to perform their assigned functions.

5.2.2 Facility Staff

The facility staff organization shall be as described in Chapter 12 of the USAR and shall function as follows:

a. The minimum number and type of personnel required onsite for each shift shall be as shown in Table 5.2-1.

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization (Continued)

b. An individual qualified in Radiation Protection Procedures shall be onsite during fuel handling operations or movement over storage racks containing fuel. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

c. The Shift Manager shall be a CERTIFIED FUEL HANDLER.

d. Fire protection program responsibilities are assigned to those positions and/or groups designated by asterisks in USAR 12.1-1 through 12.1-4 according to the procedures specified in Section 5.8 of the Technical Specifications.

e. DELETED

5.3 Facility Staff Qualification

5.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, with the exception of the Manager - Radiation Protection (MRP), who shall meet the requirements set forth in Regulatory Guide 1.8, Revision 3, dated May 2000, entitled "Qualification and Training of Personnel for Nuclear Power Plants."

5.4 Training

5.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Plant Manager or designee and shall meet or exceed the requirements of Section 6 of ANSI/ANS 3.1-1993, as modified by Regulatory Guide 1.8, Revision 3, dated May 2000 and 10 CFR Part 50.120.

5.4.2 A NRC approved training and retraining program for the CERTIFIED FUEL HANDLER shall be maintained.

TABLE 5.2-1

MINIMUM SHIFT CREW COMPOSITION (ii, iii)

Staffing Category	Minimum Staffing
CERTIFIED FUEL HANDLER	1(i)
NON-CERTIFIED OPERATOR	1(iv)

(i) This includes the individual with a CERTIFIED FUEL HANDLER qualification supervising fuel handling operations.

(ii) Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 5.2-1, provided no fuel handling operations or movement over storage racks containing fuel is in progress. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewmember being late or absent.

(iii) At least one of these individuals must be in the control room at all times when fuel is in the Spent Fuel Pool.

(iv) The NON-CERTIFIED OPERATOR position may be filled by a CERTIFIED FUEL HANDLER.

5.0 ADMINISTRATIVE CONTROLS

5.7 Not used.

5.8 Procedures

5.8.1 Written procedures and administrative policies shall be established, implemented and maintained covering the following activities:

a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, 1978;

b. DELETED

c. Not used.

d. All programs specified in Specification 5.11 through 5.24.

5.8.2 Temporary changes to procedures of 5.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the facility supervisory staff, at least one of whom is qualified as a CERTIFIED FUEL HANDLER.