

NuScaleDCRaisPEm Resource

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Sent: Friday, May 26, 2017 3:42 PM
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Subject: Request for Additional Information No. 31, RAI 8829
Attachments: Request for Additional Information No. 31 (eRAI No. 8829).pdf

Attached please find NRC staff's request for additional information concerning review of the NuScale Design Certification Application.

Please submit your response within 60 days of the date of this RAI to the NRC Document Control Desk.

If you have any questions, please contact me.

Thank you.

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Request for Additional Information No. 31 (eRAI No. 8829)

Issue Date: 05/26/2017

Application Title: NuScale Standard Design Certification - 52-048

Operating Company: NuScale Power, LLC

Docket No. 52-048

Review Section: 13.02.02 - Non-Licensed Plant Staff Training

Application Section: 13.2

QUESTIONS

13.02.02-1

Chapter 13, "Conduct of Operations," Section 13.2, "Training"

REQUIREMENTS

10 CFR 52.79(a)(33) requires the FSAR to include a description of, and plans for implementation of, the training program required by 10 CFR 50.120, "Training and qualification of nuclear power plant personnel," for licensed and non-licensed plant staff. In addition, 10 CFR 52.79(a)(34) separately requires the FSAR to include a description of, and plans for implementation of, a licensed operator requalification program that meets the requirements of 10 CFR 55.59. The review of training program information in the Design Certification Application (DCA) Part 2, Final Safety Analysis Report (FSAR) (Chapter 13, "Conduct of Operations," Section 13.2, "Training") is performed in accordance with NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition," (SRP) Chapter 13, "Conduct of Operations," Sections 13.2.1 and 13.2.2, and is required by 10 CFR 52.47(a)(9).

ISSUE

SRP Section 13.2.2, "Non-Licensed Plant Staff Training," Subsection I, states that the non-licensed plant staff training program includes the initial training, **periodic retraining**, and qualification that are required for non-licensed plant staff. SRP Section 13.2.1, "Reactor Operator Requalification Program; Reactor Operator Training," Subsection I, states that the licensed operator training program includes the **licensed operator requalification program**.

COL information item 13.2-1 under FSAR Section 13.2, "Training," states:

"A COL applicant that references the NuScale Power Plant design certification will provide a description and schedule of the initial training and qualification as well as requalification programs for reactor operators, senior reactor operators, and non-licensed plant staff (plant management, supervisory personnel, technicians, and general employees)."

Contrary to what is specified in COL information item 13.2-1 above, non-licensed plant staff training programs do not include requalification programs. Rather, non-licensed plant staff participate in "**periodic retraining**" for the purpose of maintaining proficiency following initial qualification in their job classification/category. In addition, the parenthetical information cited in COL 13.2-1 is not entirely accurate. The references to "plant management," "supervisory personnel," and "general employees" in particular, do not sufficiently represent the non-licensed plant staff personnel categories specified in both 10 CFR 50.120 and SRP Section 13.2.2.

INFORMATION NEEDED

The applicant is requested to provide separate COL information items for licensed operator training and non-licensed plant staff training programs. Specifically:

- Provide a COL information item for the COL applicant to provide a description of, and schedule for, the training program for reactor operators and senior reactor operators, and the licensed operator requalification program.
- Provide a COL information item for the COL applicant to provide a description of, and schedule for, the training program for non-licensed plant staff.

The applicant is also requested to provide the changes necessary to ensure the completeness and accuracy of the parenthetical information cited in COL information item 13.2-1 pertaining to non-licensed plant staff personnel categories.