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

August 21, 2017

Vice President, Operations
Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES NUCLEAR PLANT – APPROVAL OF CERTIFIED FUEL HANDLER TRAINING AND RETRAINING PROGRAM (CAC NO. MF9500)

Dear Sir or Madam:

By letter dated January 4, 2017, Entergy Nuclear Operations, Inc. (Entergy, the licensee) submitted a Notification of Permanent Cessation of Power Operations for the Palisades Nuclear Plant (PNP). In this letter, Entergy provided notification to the U.S. Nuclear Regulatory Commission (NRC) of its intent to permanently cease power operations at PNP on October 1, 2018.

By letter dated March 28, 2017, Entergy submitted its Certified Fuel Handler (CFH) Training and Retraining Program for PNP to the NRC for approval.

After certifications of permanent cessation of operations and permanent removal of fuel from the reactor vessel for PNP are submitted in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.82(a)(1)(i) and (ii), the 10 CFR Part 50 license no longer authorizes operation of the reactor or placement or retention of fuel in the reactor vessel. As a result, licensed reactor operators will no longer be required to support plant activities. Instead, approval of a CFH Training and Retraining Program is needed to facilitate activities associated with decommissioning and irradiated fuel handling and management.

The licensee requested NRC approval of the PNP CFH Training and Retraining Program to ensure that the monitoring, handling, storage, and cooling of irradiated fuel is performed in a safe manner. As defined in 10 CFR 50.2, the CFH is a non-licensed operator who has qualified in accordance with a fuel handler training program approved by the NRC. Non-licensed personnel are trained in accordance with 10 CFR 50.120.

The NRC has reviewed the submittal and, based on the enclosed safety evaluation, approves the PNP CFH Training and Retraining Program as requested.

If you have any questions, please contact me at 301-415-2855 or via e-mail at Scott.Wall@nrc.gov.

Sincerely,

Scott P Wall

Scott P. Wall, Senior Project Manager
Special Projects and Process Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure:
Safety Evaluation

cc w/enclosure: Listserv

UNITED STATES
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

CERTIFIED FUEL HANDLER TRAINING AND RETRAINING PROGRAM

ENTERGY NUCLEAR OPERATIONS, INC.

PALISADES NUCLEAR PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By letter dated January 4, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17004A062), Entergy Nuclear Operations, Inc. (Entergy, the licensee) submitted a Notification of Permanent Cessation of Power Operations for the Palisades Nuclear Plant (PNP). In this letter, Entergy provided notification to the U.S. Nuclear Regulatory Commission (NRC, the Commission) of its intent to permanently cease power operations at PNP on October 1, 2018.

By letter dated March 28, 2017 (ADAMS Accession No. ML17087A016), Entergy submitted its Certified Fuel Handler (CFH) Training and Retraining Program for PNP to the NRC for approval.

After certifications of permanent cessation of operations and permanent removal of fuel from the reactor vessel for PNP are submitted in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.82(a)(1)(i) and (ii), and pursuant to 10 CFR 50.82(a)(2), the 10 CFR Part 50 license no longer authorizes operation of the reactor or placement or retention of fuel in the reactor vessel. As a result, licensed reactor operators will no longer be required to support plant activities. Instead, approval of a CFH Training and Retraining Program is needed to facilitate activities associated with decommissioning and irradiated fuel handling and management.

The proposed CFH Training and Retraining Program is to be used to satisfy training requirements for the plant personnel responsible for supervising and directing the monitoring, storage, handling, and cooling of irradiated nuclear fuel in a manner consistent with ensuring the health and safety of the public. Section 10 CFR 50.2, "Definitions," requires that CFHs be qualified in accordance with an NRC-approved training program.

2.0 REGULATORY EVALUATION

Pursuant to 10 CFR 50.120(b), each holder of an operating license shall establish, implement, and maintain a training program derived from a systems approach to training (as defined in 10 CFR 55.4) providing for the training and qualification of, among other nuclear power plant personnel, non-licensed operators. As stated in 10 CFR 50.2, "*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." Under 10 CFR 50.54(y), at a nuclear power reactor facility for which the licensee has certified that operations have permanently ceased and fuel has been permanently removed from the reactor vessel, a CFH is authorized to approve taking reasonable action that departs from a license condition or a technical specification (TS) in an emergency when this action is immediately needed to protect the public health and safety and no action consistent with license conditions and TSs that can provide adequate or equivalent protection is immediately apparent.

In its Proposed Rule, "Decommissioning of Nuclear Power Reactors," published in the *Federal Register* on July 20, 1995 (60 FR 37374), the Commission explained that a certified fuel handler at a permanently shutdown and defueled nuclear power reactor undergoing decommissioning has the requisite knowledge and experience to evaluate plant conditions and make such judgements. The Final Rule, published in the *Federal Register* on July 29, 1996 (61 FR 39278), adopted the definition of "Certified Fuel Handler" in 10 CFR 50.2.

The regulatory framework concerning operator and fuel handler staffing was discussed by the NRC staff in SECY-00-145, "Integrated Rulemaking Plan for Nuclear Power Plant Decommissioning," Attachment 1, "Integrated Rulemaking Plan for Emergency Planning, Insurance, Safeguards, Staffing and Training, and Backfit at Decommissioning Nuclear Power Plants" dated June 28, 2000 (ADAMS Accession No. ML003721626), which states, in part:

> The certified fuel handler is intended to be the onshift licensee representative who is not only responsible for safe fuel handling operations at a decommissioning plant, but is always present on shift to ensure the safe maintenance and storage of spent fuel and the overall safety of any decommissioning-related activities at the facility.
>
> ...
>
> In addition, the certified fuel handler must be qualified in accordance with a certified fuel handler training program approved by the Commission. However, there are no regulations besides the definition that specifies the training requirements for the certified fuel handler.

Considering the definition of CFH in 10 CFR 50.2 and the background provided by the Final Rule, "Decommissioning of Nuclear Power Reactors," published in the *Federal Register* on July 29, 1996 (61 FR 39278), which added the definition, plus the insights provided in SECY-00-145, the NRC staff determined that an acceptable CFH training program should ensure that the trained individual has requisite knowledge and experience in spent fuel handling and storage and reactor decommissioning, and is capable of evaluating plant conditions and exercising prudent judgment for emergency action decisions. In addition, since the CFH is defined as a non-licensed operator, the NRC staff also used the criteria in 10 CFR 50.120, "Training and qualification of nuclear power plant personnel," and assessed the program against the elements of a systems approach to training (SAT) provided in the definitions section of 10 CFR 55.4.

Following the issuance of the 1996 decommissioning rule, the NRC commenced the review and approval of CFH training programs for permanently shutdown and defueled reactors consistent with the requirements in the rule. Nuclear power plants that are permanently shutdown and defueled would reassess their staffing plans related to decommissioning organization structure; retaining, re-assigning, or releasing staff; and meeting minimum staffing requirements in TSs

and regulatory required programs (e.g., emergency response organizations, fire brigade, security, etc.). The effort balanced personnel and plant status commensurate with the reduced risk once the certifications associated with permanent cessation of operations and permanent defueling had been submitted. Included in the effort was the transition from licensed operators to CFHs. With a simplified operating configuration in the permanently shutdown and defueled condition, licensed operators were replaced with CFHs following NRC approval of the CFH training program. Consistent with these changes, the training and requalification programs required by 10 CFR Part 55, "Operators' Licenses," were modified to reflect the reduced staffing levels and responsibilities of the operations staff.

Past practice of the NRC staff included reviewing the proposed CFH training program to confirm that the program was based on an SAT as defined in 10 CFR 55.4. Examples of such precedents include NRC safety evaluations for Maine Yankee Atomic Power Plant, dated November 26, 1997 (Legacy Library Accession No. 9712040233); and for Zion Nuclear Power Station, Units 1 and 2, dated July 20, 1998 (Legacy Library Accession No. 9807240263). In more recent years, the NRC staff has approved CFH training programs for Kewaunee Power Station, dated May 12, 2014 (ADAMS Accession No. ML14104A046); Crystal River Unit 3 Nuclear Generating Plant, dated June 26, 2014 (ADAMS Accession No. ML14155A181); San Onofre Nuclear Generating Station, Units 2 and 3, dated August 1, 2014 (ADAMS Accession No. ML13268A165); Vermont Yankee Nuclear Power Station, dated October 1, 2014 (ADAMS Accession No. ML14162A209); Oyster Creek Nuclear Generating Station, Clinton Power Station, Unit No. 1, and Quad Cities Nuclear Power Station, Units 1 and 2, dated September 6, 2016 (ADAMS Accession No. ML16222A787); James A. FitzPatrick Nuclear Power Plant, dated October 17, 2016 (ADAMS Accession No. ML16259A347); and Pilgrim Nuclear Power Station, dated April 12, 2017 (ADAMS Accession No. ML17058A325).

The regulatory requirements and guidance that the NRC staff used in its review of the proposed CFH Training and Retraining Program for PNP are as follows:

- 10 CFR 50.2, which states, in part, that *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, which states, in part, that:

  (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 the following categories of nuclear power plant personnel:
  (i) Non-licensed operator.

  ...

  (b)(3) The training program must incorporate the instructional requirements necessary to provide qualified personnel to operate and maintain the facility in a safe manner in all modes of operation. The training program must be developed to be in compliance with the facility license, including all technical specifications and applicable regulations. 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. The training program must be periodically reviewed by licensee management for effectiveness. 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.

- 10 CFR 55.4, "Definitions," which states, in part, that *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 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.

3.0 TECHNICAL EVALUATION

The NRC staff reviewed the specific elements of the proposed CFH Training and Retraining Program for PNP against the regulatory requirements of 10 CFR 50.120, consistent with previous NRC staff reviews and approvals of decommissioning reactor CFH training programs, together with the elements of an SAT as defined in 10 CFR 55.4.

3.1 CFH Training Program Broad-Scope Objectives

Based on the discussion of the applicable regulatory requirements in Section 2.0, the NRC staff used the following three broad-scope objectives as criteria for an acceptable CFH Training and Retraining Program:

(1) Safe conduct of decommissioning activities.
(2) Safe handling and storage of spent fuel.
(3) Appropriate response to plant emergencies.

The proposed PNP CFH Training and Retraining Program, as provided in the Attachment to Entergy's submittal dated March 28, 2017, was reviewed by the NRC staff. In its submittal, the licensee stated, in part, that the approval of a CFH Training and Retraining Program "is needed to facilitate activities associated with decommissioning and irradiated fuel handling and management."

Section 1.1, "Initial Training Program," Subsection "Fundamentals Training," of the proposed PNP CFH Training and Retraining Program states that the fundamentals training phase of the CFH Training and Retraining Program consists of lecture and/or self-study of several topics. The selection of topics will be based on a job analysis for the CFH tasks and functions and will include, among others, radiological safety principles and monitoring, facility/system design and

function, and facility administrative and safety procedures, as appropriate for the current plant status. Further, as described in the Subsection "On-the-Job Training (OJT)," the OJT phase of the proposed CFH Training and Retraining Program will include hands-on training of shift operations such as shift turnover, shift recordkeeping, removal and return of equipment to service, and specified watch standing activities. The OJT will also include training on the facility license, and the content, bases, and importance of the facility's TS. The NRC staff finds the inclusion of these topics in the initial training program to appropriately address the safe conduct of decommissioning activities.

The proposed CFH initial training program also includes lectures and/or self-study of topics appropriate to the monitoring, handling, storage, and cooling of nuclear fuel, including topics on thermodynamics, heat transfer, fluid mechanics, electrical theory, and mechanical components operation. The OJT phase of the proposed CFH Training Program includes watch-standing activities, such as operation of systems/components used to provide handling, storage, cooling, and monitoring of fuel. The NRC staff finds the inclusion of this information to appropriately address the safe handling and storage of spent fuel.

Further, the OJT phase of the proposed CFH initial training program includes training on normal, abnormal, and emergency procedures, accident analysis, and the facility's emergency plan. The NRC staff finds the inclusion of this information to adequately address the appropriate response to plant emergencies.

Section 1.2, "Retraining Program," of the proposed PNP CFH Training and Retraining Program states that all CFHs will participate in the retraining program. The CFH retraining phase will consist of lectures and/or self-study of topics appropriate to the monitoring, handling, storage, and cooling of nuclear fuel. The content of the retraining program will be based upon the tasks selected during program development for the retraining cycle. Retraining will typically include a review of changes associated with the facility and procedures, as well as problem areas associated with the monitoring, handling, storage, and cooling of nuclear fuel, and selected topics from the initial training program. The NRC staff finds the inclusion of these topics in the retraining program to be consistent with the broad-scope objectives.

Based on the above, the NRC staff concludes that the proposed CFH Training and Retraining Program for PNP addresses the safe conduct of decommissioning activities; safe handling and storage of spent fuel; and the appropriate response to plant emergencies.

3.2 CFH Training and Retraining Program Evaluation

The NRC staff reviewed the specific elements of the proposed CFH Training and Retraining Program for PNP against the regulatory requirements of 10 CFR 50.120(b)(2) and (b)(3), consistent with previous NRC staff reviews and approvals of decommissioning reactor CFH training programs, and has summarized the results of this review below.

3.2.1 Use of a Systems Approach to Training

Section 50.120(b)(2) of 10 CFR states, in part, that "[t]he training program must be derived from a systems approach to training as defined in 10 CFR 55.4...." The licensee stated in its submittal dated March 28, 2017, that "[t]he training plan will adhere to the guidelines of

Revision 1 of NUREG-1220, 'Training Review Criteria and Procedures,'[1] that are applicable to a permanently defueled facility and be developed utilizing the [SAT] process."

Section 1, "Introduction," of the proposed PNP CFH Training and Retraining Program states, in part, that:

> The Certified Fuel Handler Training and Retraining Program contained herein describes the training program to be implemented at the Palisades Nuclear Plant (PNP) to ensure the monitoring, handling, storage and cooling of nuclear fuel is performed in a manner consistent with ensuring the public health and safety.
>
> The program describes the personnel to whom the program applies, the areas in which training is provided, what constitutes certification, how certification is maintained, and required qualifications (e.g., medical).

The NRC staff reviewed the proposed CFH Training and Retraining Program to ensure that it includes all five of the required elements of a SAT-based program, which are:

(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 the learning objectives,

(4) Evaluation of trainee mastery of the objectives during training, and

(5) Evaluation and revision of the training based on the performance of trained personnel in the job setting.

Section 1.1, "Initial Training Program," of the proposed PNP CFH Training and Retraining Program states that the selection of topics for the fundamentals training phase of the program will be based on a job analysis for the CFH tasks and functions. The job analysis will be performed by an individual holding a Senior Reactor Operator (SRO) license at the facility. A Difficulty, Importance and Frequency (DIF) rating will be assigned to each CFH task by a holder of an SRO license who is familiar with the expected plant conditions during decommissioning. A review of the DIF ratings for each task will be performed by Operations and Training personnel and management. Learning objectives will be derived from the analysis to describe the desired performance after training. Training materials will be designed based on the learning objectives.

The NRC staff reviewed Entergy procedure EN-TQ-201, Revision 22, "Systematic Approach to Training Process"; procedure EN-TQ-201-01, Revision 16, "SAT – Analysis Phase"; and procedure EN-TQ-201-02, Revision 3, "SAT – Design Phase," referenced in the submittal. Procedure EN-TQ-201-01 describes the activities performed in the analysis phase of the SAT process and provides specific guidance to ensure that the outcome of the analysis phase includes an approved task/topic list representing the tasks performed by each affected work group and a determination of which tasks/topics require initial and/or continuing training. Procedure EN-TQ-201-02 describes the activities performed in the design phase of the SAT

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[1] U.S. Nuclear Regulatory Commission, NUREG-1220, Revision 1, "Training Review Criteria and Procedures," January 1993 (ADAMS Accession No. ML102571869).

process and provides guidance on the development of learning objectives, determination of training settings, preparation of training program procedures, development of evaluation instruments, and design of qualification structures.

Section 1.2, "Retraining Program," of the proposed CFH Training and Retraining Program states that all CFHs will participate in the retraining program. The content of the retraining program will be based upon the tasks selected during program development for the retraining cycle. A retraining plan will be developed and approved by the Plant Manager (or designee). The training plan will be developed utilizing the SAT process.

The NRC staff reviewed the licensee's process to analyze the jobs to be performed and to derive learning objectives from that analysis for training and retraining and finds it to be consistent with SAT elements 1 and 2.

Element 3 of the SAT requires that the training design and implementation be based upon the learning objectives. Section 1.1 of the proposed CFH Training and Retraining Program states that training materials will be designed based on the learning objectives.

The NRC staff reviewed Entergy procedure EN-TQ-201-03, Revision 11, "SAT – Development Phase," referenced in the submittal. Procedure EN-TQ-201-03 describes the activities performed in the development phase of the training system development process. It provides specific guidance on the development of approved training material to ensure that learning objectives are achieved.

The NRC staff reviewed the licensee's process to design and implement training based upon the learning objectives and finds it to be consistent with SAT element 3.

Section 1.1 of the proposed PNP CFH Training and Retraining Program states that a comprehensive exam at the end of the course will provide assurance of mastery of the skills, knowledge, and abilities required for successful performance of the CFH job and associated tasks. Further, as described in the Subsection "Candidate Evaluation," a comprehensive final examination is to be administered at the end of the initial training program. The comprehensive examination will include a written and an operating examination. The written examination requires a minimum score of 80 percent to pass. The operating examination will consist of Job Performance Measures (JPMs), and each JPM will be scored on a pass/fail basis. Passing criteria for an individual JPM is that the examinee successfully completes the assigned task in accordance with the governing procedure without missing any critical steps. The critical steps for each JPM will be defined in accordance with NUREG-1021, Revision 11, "Operator Licensing Examination Standards for Power Reactors," February 2017 (ADAMS Accession No. ML17038A432), or later. The operating examination requires passing a minimum of 80 percent of the administered JPMs to pass.

Section 1.2, Subsection "Examinations," of the proposed PNP CFH Training and Retraining Program states that participants in the CFH retraining program must pass a biennial written examination and an annual operating examination to maintain their qualification. The written examination requires a minimum score of 80 percent to pass. The operating examination will consist of JPMs and each JPM will be scored on a pass/fail basis. The operating examination requires passing a minimum of 80 percent of the administered JPMs to pass.

The NRC staff reviewed Entergy procedure EN-TQ-201-04, Revision 6, "SAT – Implementation Phase," referenced in the submittal. Procedure EN-TQ-201-04 describes activities performed in

the implementation phase of the SAT process. It provides specific guidance on the major activities of the implementation phase, including implementation of a training plan, conduct of training, conduct of in-training evaluation, and documentation of training.

The NRC staff reviewed the licensee's process to evaluate the trainee mastery of the objectives during training and retraining and finds it to be consistent with SAT element 4.

Section 1.3, "Program Evaluation," of the PNP CFH Training and Retraining Program states that routine assessments of the effectiveness and accuracy of the training are conducted by appropriate management personnel during and at the end of each 2-year training cycle. Evaluation results are reviewed by a station oversight board as defined in site procedures and any required changes, as determined by the station oversight board, are incorporated into the program.

The NRC staff reviewed Entergy procedure EN-TQ-201-05, Revision 3, "SAT – Evaluation Phase," referenced in the submittal. Procedure EN-TQ-201-05 describes the activities performed in the evaluation phase of the training system development process. It provides specific guidance for the conduct of the activities during the evaluation phase, including monitoring feedback, evaluating training effectiveness, and initiating corrective actions.

The NRC staff reviewed the licensee's process to evaluate and revise the training based on the performance of trained personnel and finds it to be consistent with SAT element 5.

Based on the above, the NRC staff concludes that the proposed CFH Training and Retraining Program includes the five elements of 10 CFR 55.4 and thus complies with 10 CFR 50.120(b)(2).

3.2.2 Compliance with the Requirements of 10 CFR 50.120(b)(3)

The NRC staff also verified that the proposed CFH Training and Retraining Program meets the requirements of 10 CFR 50.120(b)(3). Specifically, 10 CFR 50.120(b)(3) requires that the training program:

a. Incorporate the instructional requirements necessary to provide qualified personnel to operate and maintain the facility in a safe manner in all modes of operation;

b. Be developed to be in compliance with the facility license, including all technical specifications and applicable regulations;

c. Be periodically evaluated and revised as appropriate to reflect industry experience as well as changes to the facility, procedures, regulations, and quality assurance requirements;

d. Be periodically reviewed by licensee management for effectiveness; and

e. Ensure the licensee maintains and keeps available sufficient records to maintain program integrity and allow for NRC inspection to verify the adequacy of the program.

The NRC staff reviewed the proposed CFH Training and Retraining Program and confirmed that each of the 10 CFR 50.120(b)(3) requirements is satisfied as discussed below.

Section 1.1, Subsection "Fundamentals Training," states that the job analysis will be performed by an individual holding an SRO license at PNP. Learning objectives will be derived from the analysis to describe the desired performance after training, and training materials will be designed based on the learning objectives. Section 1.1, Subsection "Candidate Evaluation," states that a comprehensive final examination will be administered at the end of the initial training program consisting of a written examination and an operating examination described in Appendices A and B, respectively. Further, Section 1.2, Subsection "Course Schedule," states that the CFH Retraining Program will be administered in a biennial training cycle; that this cycle will include annual operating examinations and biennial written examination; and that biennial and annual are as defined in Revision 11 of NUREG-1021, or later. Appendices A and B of the proposed CFH Training and Retraining Program provide a compendium of instructional areas that the licensee has identified as required instructional areas necessary to ensure that the CFHs will be trained in all areas necessary to maintain the facility and operate equipment in a safe manner. The NRC staff finds that this satisfies element "a" above.

Section 1, "Introduction," states, in part, that the training program will comply with the facility's TSs and be consistent with the level of hazard at the facility to ensure that the facility is maintained in a safe and stable condition. It further states that candidates in the training program will meet minimum applicable operator experience requirements of the facility's TSs. Section 1.1, Subsection "Eligibility Requirements," states that the CFH Training Program will use the definition of nuclear power plant experience listed in American National Standards Institute (ANSI) 3.1-1978, as amended to include nuclear power plant experience acquired at a defueled reactor site which has spent nuclear fuel stored in its spent fuel pool. PNP TS Section 5.0, "Administrative Controls," contains responsibility, organization, unit staff qualifications, procedures, programs and manuals, high radiation area, and reporting requirements. The NRC staff finds that this is consistent with element "b" above.

Section 1.3, "Program Evaluation," states that routine assessments of the effectiveness and accuracy of training are conducted by appropriate Entergy management personnel during and at the end of each 2-year training cycle. These routine assessments ensure that the PNP CFH Training and Retraining Program (1) contains the guidance necessary to ensure compliance with the requirements of the SAT process defined in 10 CFR 50.120(b)(3); and (2) is revised to incorporate changes to the program, as appropriate, to reflect industry experience, changes to the facility, procedures, regulations, and quality assurance requirements. The evaluation results will be reviewed by a station oversight board as defined in PNP site procedures. The station oversight board will verify the resolution of any discrepancies identified by the evaluation. Any required changes to the program determined by the station oversight board, will be incorporated into the program. The NRC staff reviewed the provisions for evaluating and revising the proposed CFH Training and Retraining Program and finds that they satisfy the program evaluation requirements of elements "c" and "d" above.

Section 1.4, "Records Retention," states that records associated with the proposed CFH Training and Retraining Program will be retained in a retrievable format until there is no longer a need for the CFH position at the facility (i.e., when all fuel is permanently transferred to a dry fuel storage facility). Further, Section 1.5, "Evaluating Changes to the CFH Training and Retraining Program," states that changes may be made to the training program elements without NRC approval as long as the following are applicable: (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. The NRC staff finds that this is consistent with element "e" above.

4.0 CONCLUSION

The NRC staff's review of the proposed CFH Training and Retraining Program for PNP determined that the program adequately addresses the safe conduct of decommissioning activities, the safe handling and storage of spent fuel, the appropriate response to plant emergencies, and is consistent with the SAT processes defined by 10 CFR 55.4 and the requirements of 10 CFR 50.120(b)(2) and (b)(3). Based on the above findings, the NRC staff approves the CFH Training and Retraining Program for PNP, pursuant to 10 CFR 50.2. Because the program is based on SAT, the licensee may change elements of the program without NRC approval as long as the following are applicable:

(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..

Principal Contributor: Scott P. Wall, NRR

Date: August 21, 2017

SUBJECT: PALISADES NUCLEAR PLANT – APPROVAL OF CERTIFIED FUEL HANDLER TRAINING AND RETRAINING PROGRAM (CAC NO. MF9500) DATED: AUGUST 21, 2017

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