



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

April 11, 2019

Mr. Paul A. Harden
Senior Vice President, Chief Operating Officer, and Chief Nuclear Officer
FirstEnergy Nuclear Operating Company
341 White Pond Drive
Akron, OH 44320

SUBJECT: FENOC FLEET - BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2;
DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1; AND PERRY
NUCLEAR POWER PLANT, UNIT NO. 1 - APPROVAL OF CERTIFIED FUEL
HANDLER TRAINING AND RETRAINING PROGRAM (EPID L-2018-LLL-0023)

Dear Mr. Moul:

By letter dated August 15, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18227A019), FirstEnergy Nuclear Operating Company (FENOC, the licensee) requested U.S. Nuclear Regulatory Commission (NRC, the Commission) approval of the Certified Fuel Handler Training and Retraining Program (CFHTRP) for use at Davis-Besse Nuclear Power Station, Unit No. 1 (DBNPS), Beaver Valley Power Station (BVPS), Unit Nos. 1 and 2, and Perry Nuclear Power Plant, Unit No. 1 (PNPP).

By letter dated April 25, 2018 (ADAMS Accession No. ML18115A007), the licensee submitted a Notification of Permanent Cessation of Power Operations for DBNPS, BVPS, and PNPP. In this letter, FENOC notified the NRC of its intent to permanently cease power operations at DBNPS, by May 31, 2020; BVPS, Unit No. 1, and PNPP, by May 31, 2021; and BVPS, Unit No. 2, by October 31, 2021.

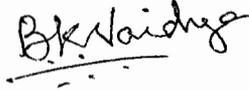
After certifications of permanent cessation of operations and of permanent removal of fuel from the reactor vessel are submitted in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.82(a)(1)(i) and (ii), the 10 CFR Part 50 licenses no longer authorize operation of the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

The licensee requested NRC approval of the CFHTRP 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, a certified fuel handler (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 CFHTRP as requested.

If you have any questions, please contact me at 301-415-3308 or by e-mail to Bhalchandra.Vaidya@nrc.gov.

Sincerely,



Bhalchandra Vaidya, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-334, 50-412, 50-346, 50-440

Enclosure:
Safety Evaluation

cc:

Mr. David B. Hamilton
Site Vice President
FirstEnergy Nuclear
Operating Company
Mail Stop A-PY-A290
P.O. Box 97, 10 Center Road
Perry, OH 44081-0097

Mr. Mark Bezilla
Site Vice President
FirstEnergy Nuclear
Operating Company
Mail Stop A-DB-3080
5501 North State, Route 2
Oak Harbor, OH 43449-9760

Mr. Richard D. Bologna
Site Vice President
FirstEnergy Nuclear
Operating Company
Beaver Valley Power Station
Mail Stop A-BV-SSB
P.O. Box 4, Route 168
Shippingport, PA 15077

Additional Distribution by Listserv



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
REGARDING CERTIFIED FUEL HANDLER TRAINING AND RETRAINING PROGRAM

FIRSTENERGY NUCLEAR OPERATING COMPANY
BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2
DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1
PERRY NUCLEAR POWER PLANT, UNIT NO. 1
DOCKET NOS. 50-334, 50-412, 50-346, AND 50-440

1.0 INTRODUCTION

By letter dated August 15, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18227A019), FirstEnergy Nuclear Operating Company (FENOC, the licensee) requested U.S. Nuclear Regulatory Commission (NRC, the Commission) approval of the Certified Fuel Handler Training and Retraining Program (CFHTRP) for use at Beaver Valley Power Station (BVPS), Unit Nos. 1 and 2, Davis-Besse Nuclear Power Station, Unit No. 1 (DBNPS), and Perry Nuclear Power Plant, Unit No. 1 (PNPP). This request was submitted in support of FENOC's notification by letter dated April 25, 2018 (ADAMS Accession No. ML18115A007), that it had decided to permanently cease power operations at DBNPS by May 31, 2020; at BVPS, Unit No. 1, and PNPP by May 31, 2021; and at BVPS, Unit No. 2, by October 31, 2021.

After certifications of permanent cessation of operations and of permanent removal of fuel from the reactor vessel 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 licenses will no longer authorize operation of the reactors or placement or retention of fuel in the reactor vessels. As a result, licensed reactor operators will no longer be required to support plant activities. Instead, approval of a CFHTRP is needed to facilitate activities associated with decommissioning and irradiated fuel handling and management.

The proposed CFHTRP 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. The regulation at 10 CFR 50.2, "Definitions," requires that certified fuel handlers (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 (SAT) (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 in an emergency when this action is immediately needed to protect the public health and safety and no action consistent with license conditions and technical specifications 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 CFH 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 a 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, 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 an 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 shut down and

defueled would reassess their staffing plans related to decommissioning organization structure; retaining, reassigning, or releasing staff; and meeting minimum staffing requirements in technical specifications 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 (SEs) 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); Pilgrim Nuclear Power Station, dated April 12, 2017 (ADAMS Accession No. ML17058A325); and Three Mile Island Nuclear Station, Unit 1 (ADAMS Accession No. ML17228A729), dated December 29, 2017.

The regulatory requirements and guidance that the NRC staff used in its review of the proposed CFHTRP for BVPS, Unit Nos. 1 and 2, DBNPS, and PNPP 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(b), which states, in part, that:
 - (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.
 - ...
 - (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 CFHTRP for BVPS, Unit Nos. 1 and 2, DBNPS, and PNPP 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 CFHTRP Broad-Scope Objectives

Based on the discussion of the applicable regulatory requirements in Section 2.0 of this SE, the NRC staff used the following three broad-scope objectives as criteria for an acceptable CFHTRP:

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

The NRC staff reviewed the proposed CFHTRP, as provided in the Attachment to FENOC's submittal dated August 15, 2018. The licensee stated, in part, that the approval of a CFHTRP is requested, "in order to support future decommissioning efforts and preparations for the timely transition of DBNPS, and subsequently the BVPS and PNPP, to a permanently shutdown and defueled condition."

In the licensee's submittal, Section 1, "Purpose," Subsection 1.2 states that the CFHTRP will apply to DBNPS, BVPS, and PNPP once the certifications of permanent cessation from operations and of removal of fuel from the reactor have been submitted to the NRC for these facilities. Section 3.2, "Initial Training," Subsection 3.2.2, "Fundamentals Training," states that the fundamentals training phase of the CFHTRP 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 Subsection 3.2.3, "On-The-Job Training (OJT)," the OJT phase of the CFHTRP 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 technical specifications. The NRC staff finds the inclusion of these topics in the initial training program to be consistent with objective (1) above.

The proposed CFHTRP 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 CFHTRP 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 be consistent with objective (2) above.

Further, the OJT phase of the proposed CFHTRP 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 be consistent with objective (3) above.

In the licensee's submittal, Section 3.3, "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 CFHTRP for BVPS, Unit Nos. 1 and 2, DBNPS, and PNPP addresses all of the three broad-scope objectives.

3.2 CFHTRP Evaluation

The NRC staff reviewed the specific elements of the proposed CFHTRP for BVPS, Unit Nos. 1 and 2, DBNPS, and PNPP 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 August 15, 2018, that, "[t]he FENOC Certified Fuel Handler Training and Retraining Program will ensure that the qualifications of personnel are commensurate with the tasks to be performed and the plant conditions requiring response." The licensee further stated that the CFHTRP will "align with the provisions of 10 CFR 50.120" and provides "adequate

confidence that appropriate SAT based training of personnel who will perform CFH duties is conducted to ensure the facility is maintained in a safe and stable condition.”

Section 3.1, “General Guidelines,” Subsection 3.1.1 of the CFHTRP states:

The Certified Fuel Handler Training and Retraining Program contained herein describes the training program to be implemented by FENOC to ensure the monitoring, handling, storage, and cooling of spent nuclear fuel is performed in a manner consistent with ensuring the public health and safety for FENOC facilities that have transitioned to a permanently defueled status.

In addition, Section 3.1, Subsection 3.1.2, states, in part:

The Certified Fuel Handler Training and Retraining 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 qualification (e.g., medical).

Further, Subsections 3.1.6 and 3.1.9 state that the CFHTRP is based on an SAT process and consists of an initial training program and a requalification training program, which are described in the submittal.

The NRC staff reviewed the proposed CFHTRP to ensure that it includes all five of the required elements of an 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 3.2.2, “Fundamentals Training,” of the proposed CFHTRP 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 incumbent Senior Reactor Operator, a training Subject Matter Expert, and a site decommissioning Subject Matter Expert, in accordance with the requirements of NOBP-TR-0001, “Systematic Approach to Training Process.” This procedure outlines a graded approach to evaluating job tasks and includes Difficulty, Importance, and Frequency ratings for each new job task. The proposed CFHTRP further states that the SAT process is applied to the program which includes deriving learning objectives from the analyses which describe the desired performance after training.

The NRC staff finds that the content of the licensee’s procedure NOBP-TR-0001, as described in Section 3.2, Subsection 3.2.2.1, of the program is appropriate to conduct systematic analyses of jobs to be performed and to derive learning objectives from the associated analyses and is, therefore, consistent with SAT elements 1 and 2. In addition, Section 3.2, Subsection 3.2.2.1, states that training materials will be designed based on the learning objectives, which is consistent with SAT element 3.

Section 3.3, Subsection 3.3.1, "Course Schedule," of the proposed CFHTRP 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 General Plant Manager (or designee).

The NRC staff finds that the training plan will be developed utilizing the SAT process and that the approach described above is consistent with SAT elements 1, 2, and 3.

Section 3.2, Subsection 3.2.2.1, of the proposed CFHTRP states that a comprehensive examination 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, Subsection 3.2.4, "Candidate Evaluation," states that 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 tasks. The critical tasks for each JPM will be defined in accordance with NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 11, or later (ADAMS Accession No. ML17038A432). The operating examination requires passing a minimum of 80 percent of the administered JPMs to pass.

Section 3.3, Subsection 3.3.1, 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. As with the initial training program, critical tasks for each JPM will be defined in accordance with NUREG-1021, Revision 11, or later.

Section 3.3, Subsection 3.3.2.3, states that the General Plant Manager (or designee) may exempt an individual from a specific retraining requirement provided that such exemptions, including the basis, are documented using a process similar to the FENOC training exemption process defined in FENOC procedure NOBP-TR-0001. However, the program specifies that the biennial medical examination cannot be exempted. In addition, an individual shall not be exempted from the annual operating or biennial written examinations unless that individual prepared the examination. Further, no individual may be exempted from any two consecutive annual operating examinations or any two consecutive biennial written examinations.

The attributes of the proposed CFHTRP discussed above address the elements required to effectively assess the CFH training candidate's knowledge and proficiency of the learning objectives. Therefore, the NRC staff finds that the licensee's process to evaluate the trainee mastery of the objectives during training and retraining is consistent with SAT element 4.

Section 3.4, "Program Evaluation," of the proposed CFHTRP states that routine assessments of the effectiveness and accuracy of the training program are conducted by appropriate management personnel at the facility in a permanently defueled condition 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 attributes of the proposed CFHTRP discussed above address the elements required to periodically evaluate the CFH training program and identify any required changes to ensure the continued effectiveness of the program. Therefore, the NRC staff finds that the licensee's process to evaluate and revise the training based on the performance of trained personnel is consistent with SAT element 5.

Based on the above, the NRC staff concludes that the proposed CFHTRP 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 CFHTRP 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 NRC inspection to verify the adequacy of the program.

The NRC staff reviewed the proposed CFHTRP and confirmed that each of the 10 CFR 50.120(b)(3) requirements is satisfied as discussed below:

- Section 3.2, Subsection 3.2.2.1, states that the job analysis for the CFH tasks and functions will be conducted by an incumbent Senior Reactor Operator, a training Subject Matter Expert, and a site decommissioning Subject Matter Expert. The proposed CFHTRP further states that the SAT process is applied to the program which includes deriving learning objectives from the analyses which describe the desired performance after training. Training materials will be designed based on the learning objectives. Subsection 3.2.4.1 states that a comprehensive final examination is 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 3.3, Subsection 3.3.1.4, states that participants in the CFH retraining phase of the program must pass a biennial written examination and an annual operating examination to maintain their qualification, with examination areas described in Appendices A and B, respectively. Appendices A and B of the proposed CFHTRP provide aspects of the

CFH position and duties and tasks that are to be tested. The NRC staff finds that this satisfies element "a" above.

- Section 3.1, Subsection 3.1.2, states that the training program shall comply with the applicable American National Standards Institute/American Nuclear Society standard requirements for the qualification and training of plant personnel, as specified in the facility's technical specifications, and shall be consistent with the level of hazard at the facility and ensure that the facility is maintained in a safe and stable condition. The NRC staff finds that this is consistent with element "b" above.
- Section 3.4 states that 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. Routine assessments of the effectiveness and accuracy of the training program are conducted by appropriate management personnel at the facility in a permanently defueled condition during and at the end of each 2-year training cycle. Evaluation results are reviewed by a station oversight board. Resolution of any discrepancies identified by the evaluation will be verified by the station oversight board, and any required changes, as determined by the board, will be incorporated into the program. The NRC staff reviewed the provisions for evaluating and revising the CFHTRP and finds that they satisfy the program evaluation requirements of elements "c" and "d" above.
- Section 3.5, "Record Retention," states that records associated with the proposed CFHTRP 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 3.6, "Evaluating Changes to the Certified Fuel Handler 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 CFHTRP for BVPS, Unit Nos. 1 and 2, DBNPS, and PNPP 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 (3). Based on the above findings, the NRC staff approves the CFHTRP for BVPS, Unit Nos. 1 and 2, DBNPS, and PNPP pursuant to 10 CFR 50.2. Because the program is based on SAT, as described in Section 3.6 of the

FENOC CFHTRP, 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: John D. Hughey NRR/DRA

SUBJECT: FENOC FLEET - BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2;
 DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1; AND PERRY
 NUCLEAR POWER PLANT, UNIT NO. 1 - APPROVAL OF CERTIFIED FUEL
 HANDLER TRAINING AND RETRAINING PROGRAM (EPID L-2018-LLL-0023)
 DATED APRIL 11, 2019

DISTRIBUTION:

PUBLIC	RidsNrrPMDavisbesse Resource
PM File Copy	RidsNrrPMBeavervalley Resource
RidsNrrDorl Resource	RidsOgcRp Resource
RidsNrrDorlLpl1 Resource	RidsAcrcsMailCenter Resource
RidsNrrDorlLpl3 Resource	RidsOpaMail Resource@nrc.gov
B. Vaidya, NRR/DORL/LPL3	RidsRgn1MailCenter Resource
RidsNrrLASRohrer Resource	RidsRgn3MailCenter Resource
RidsNrrLALRonewicz Resource	RidsNrrDraApob Resource
RidsNrrPMPerry Resource	J. Hughey, NRR/DRA/APHB

ADAMS Accession No.: ML19028A030;

*** by SE Input Memo or E-Mail**

OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LPL3/LA	NRR/DRA/APOB/BC(*)
NAME	BVaidya	SRohrer	CJFong
DATE	1/29/2019	1/29/2019	1/18/2019
OFFICE	OGC*	NRR/DORL/LPL3/BC	NRR/DORL/LPL3/PM
NAME	JWachutka	DWrona	BVaidya
DATE	2/7/2019	4/11/2019	4/11/2019

OFFICIAL RECORD COPY