NEXTera ENERGY
DUANE ARNOLD

May 30, 2019

NG-19-0071
10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Duane Arnold Energy Center
Docket No. 50-331

Response to Request for Additional Information Regarding Request for Approval of Certified Fuel Handler Training Program

References:

1. NextEra Energy Duane Arnold, LLC letter NG-19-0003, "Request for Approval of Certified Fuel Handler Training Program", January 29, 2019 (ML19037A016)
2. NRC E-Mail: "Draft Request for Additional Information - Duane Arnold Energy Center (DAEC) - Request for Approval of Certified Fuel Handler Training Program - EPID: L-2019-LLL-0003". From Mahesh Chawla, NRC, May 9, 2019

In Reference 1, NextEra Energy Duane Arnold, LLC (NextEra) submitted a request for approval of a Certified Fuel Handling Training Program. In Reference 2, the NRC staff requested additional information to support its review of the LAR. The Enclosure to this letter provides NextEra's response to the request for additional information (RAI).

If you have any questions or require additional information, please contact J. Michael Davis, Licensing Manager, at 319-851-7032.

P Hansen for D. Curtland
Dean Curtland
Site Director, Duane Arnold Energy Center
NextEra Energy Duane Arnold, LLC

Enclosure

cc: Regional Administrator, USNRC, Region III,
Project Manager, USNRC, Duane Arnold Energy Center
Resident Inspector, USNRC, Duane Arnold Energy Center
A. Leek (State of Iowa)

Enclosure

Response to Request for Additional Information

Regulatory Basis:

Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.34(f)(2)(iii) requires, in part, that the licensee or applicant provide, for Commission review, a control room design that reflects state-of-the-art human factor principles.

Chapter 18, "Human Factors Engineering," Revision 3, of NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition," provides guidance for the review of Human Factors Engineering (HFE) considerations of plant modifications and important human actions (HAs). NUREG-0711, "Human Factors Engineering," Revision 3, provides guidance for the staff's review of HFE programs, to ensure that HFE practices and guidelines were appropriately considered and incorporated in the plant design and modifications. NUREG-1764, "Guidance for the Review of Changes to Human Actions," Revision 1, provides guidance for reviewing changes to HAs, such as those that are credited in nuclear power plant safety analysis.

NUREG-0711, Review Element 10, "Training Program Development," provides guidance for the NRC staff's evaluation of the training program which offers reasonable assurance that plant personnel have the requisite knowledge, skills, and abilities to perform their roles and responsibilities. Section 10.4.3, "Learning Objectives," states, in part, that the applicant should derive learning objectives from the analysis describing the desired performance after training. Section 3.2.2.1 of the Fundamental Training section of the License Amendment Request states that training materials will be designed based on the learning objectives. The NRC staff has reviewed procedure TR-AA-203-1000, Revision 1, "Systematic Approach to Training Process," which contains a section on the design phase of the training process. It is not clear from the procedure how the learning objectives will be developed.

Please provide a detailed description of the process for developing the learning objectives for the Certified Fuel Handler Training and Continuing Training Program.

NextEra Response

NextEra Energy Duane Arnold (DAEC) utilizes the Systematic Approach to Training as prescribed by TR-AA-230, Systematic Approach to Training, and TR-AA-230-1000, Systematic Approach to Training Process.

The initial objectives included in the training program description were taken from other certified fuel handler (CFH) training program descriptions that were previously approved by the NRC. The DAEC staff reviewed these objectives for applicability to our Certified Fuel Handler Training Program using Job Analysis and Task Analysis processes and found the objectives to be satisfactory as terminal objectives.

Each terminal objective was evaluated by an experienced fuel handler for the required knowledge, skills, and tasks that would be required to meet that terminal objective. A

task list and a list of enabling objectives were then generated. Many of the objectives are duplicated in the Operations Training Program and were evaluated and imported into the Certified Fuel Handler program.

Once all of the enabling objectives are defined, they will be reviewed by the Operations Department line supervisors and adjusted as necessary.

In summary, DAEC is following the Systematic Approach to Training as prescribed by TR-AA-230 and TR-AA-230-1000. The objectives are being developed by an experienced fuel handler and will be reviewed by operations management. In addition, DAEC utilized training objectives from the Operations Department Training Program where duplication of objectives and tasks were deemed applicable to the CFH program.