

ZRA98013
March 16, 1998

United States Nuclear Regulatory Commission
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Washington, DC 20555-001

SUBJECT: Request for Approval of the Certified Fuel Handler Training and Retraining Program
Zion Station, Units 1 and 2
Docket Nos. 50-295 and 50-304

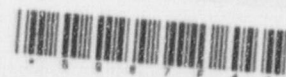
REFERENCES:

- 1) Letter from O. D. Kingsley to USNRC (DCD), dated February 13, 1998; Certification of Permanent Cessation of Operation of Zion Nuclear Power Station;
- 2) Letter from O. D. Kingsley to USNRC (DCD), dated March 9, 1998; Certification of Permanent Fuel Removal from Zion Station.
- 3) Letter from Michael J. Meisner to USNRC (DCD), dated August 15, 1997; Request for Approval of the Certified Fuel Handler Training and Retraining Program; Maine Yankee.
- 4) Letter from Michael J. Webb (USNRC) to Michael B. Sellman (Maine Yankee), dated November 26, 1997. Issuance of Amendment No. 160 to Facility Operating License No. DPR-36, Maine Yankee Atomic Power Station.
- 5) Letter from D. H. Dorman (USNRC) to Michael B. Sellman (Maine Yankee), dated September 12, 1997; Request for Additional Information Regarding Proposed Revision to the Technical Specifications and the Certified Fuel Handler for the Maine Yankee Nuclear Plant.
- 6) Letter from T. Fredricks (for L.H. Thonus) (USNRC) to S. M. Quennoz (Trojan), dated May 23, 1997; Issuance of Amendment No. 197 to Facility Operating License No. NPF-1, Trojan Nuclear Power Station.

The purpose of this letter is to request Nuclear Regulatory Commission (NRC) approval of Zion Station's Certified Fuel Handler (CFH) Training and Retraining Program. Commonwealth Edison (ComEd) has previously notified the NRC of the permanent cessation of operation (Reference 1) and defueling of Zion Station (Reference 2). Based on these submittals, plant operating activities which require Licensed Operators and Senior Reactor Operator Licenses will no longer be conducted.

A copy of Zion's proposed CFH Training and Retraining Program is contained in Attachment A. The program is patterned after Maine Yankee's Certified Fuel Handler Program which has been previously submitted (Reference 3) and approved by the NRC (Reference 4), with the salient

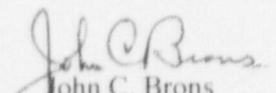
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differences in Zion's proposed CFH program summarized in Attachment B. Zion's program also addresses the questions posed by the NRC in its Request for Additional Information (RAI) on the Maine Yankee program (Reference 5). Zion's CFH Training and Retraining Program ensures that the qualifications of operations personnel are commensurate with the tasks to be performed and the conditions requiring response. Section 50.120 of Title 10 of the Code of Federal Regulations, Training and Qualification of Nuclear Power Plant Personnel, requires training programs to be established, implemented, maintained, and derived using a systems approach to training (SAT) as defined in 10 CFR 55.4. This submittal describes a program that will fulfill those requirements. The five key elements are: (1) analysis of job performance requirements and training needs, (2) derivation of learning objectives based on the preceding analysis, (3) design and implementation of the training program based upon learning objectives, (4) trainee evaluation, and (5) program evaluation and revision.

The CFH Training and Retraining Program provides adequate confidence that appropriate SAT based training of personnel who will perform Certified Fuel Handler duties is conducted to ensure the facility is maintained in a safe and stable condition. The program allows for changes to be made to the program without prior NRC approval provided the program continues to comply with ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971, consistent with level of hazard at the facility and to ensure the facility is maintained in a safe and stable condition. This is consistent with a change recently approved for Trojan Station's CFH training program (Reference 6).

In a separate submittal, ComEd will provide a license amendment request to delete the requirements for Licensed Reactor Operators and Senior Reactor Operators and add the requirements for Certified Fuel Handler.


John C. Brons
Site Vice President
Zion Station

Attachment A:	Zion Station Certified Fuel Handler Training and Retraining Program
Attachment B:	Salient Differences Between Zion Station's and Maine Yankee's Certified Fuel Handler Program
Attachment C:	List of Commitments

cc: NRC Regional Administrator - RIII
NRC Senior Resident Inspector - Zion
NRR Project Manager
State of Illinois - IDNS
IDNS Resident Inspector