

February 6, 2014

10CFR50.2

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: **Docket Nos. 50-361 and 50-362
Response to Request for Additional Information Regarding Certified Fuel
Handler Training Program Approval Request
San Onofre Nuclear Generating Station Unit 2 and 3**

- References: (1) E-mail from Christopher Gratton (NRC) to Mark Morgan (SCE),
Subject: "San Onofre Nuclear Generating Station, Units 2 and 3
Request for Additional Information Regarding Certified Fuel Handler
Training Program Approval Request Docket No. 50-361 and 50-362"
dated January 27, 2014
- (2) Letter R. J. St. Onge (SCE) to Document Control Desk (NRC),
Subject: "Docket No. 50-361 and 50-362 Request for Approval of the
Safe Storage Shift Manager/Certified Fuel Handler Training Program
San Onofre Nuclear Generating Station Units 2 and 3", dated August
20, 2013

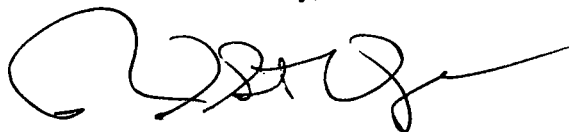
Dear Sir or Madam:

By e-mail dated January 27 2014, the Nuclear Regulatory Commission (NRC) issued a Request for Additional Information (Reference 1) regarding San Onofre Nuclear Generating Station Units 2 and 3 Certified Fuel Handler Training Program Approval Request (Reference 2). Enclosure 1 provides Southern California Edison's (SCE's) response.

There are no new regulatory commitments contained in this letter.

If you have any questions or require additional information, please contact Mr. Mark Morgan, at (949) 368-6745.

Sincerely,



Enclosure: 1. Response to San Onofre Nuclear Generating Station, Units 2 and 3 Request for Additional Information Regarding Certified Fuel Handler Training Program Approval Request Docket No. 50-361 and 50-362

cc: M. Dapas, Regional Administrator, NRC Region IV
C. Gratton, NRC Project Manager, San Onofre Units 2 and 3
G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 and 3

Enclosure 1

**Response to
San Onofre Nuclear Generating Station, Units 2 and 3
Request for Additional Information Regarding
Certified Fuel Handler Training Program Approval Request
Docket No. 50-361 and 50-362**

RAI:

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 55.4, "Definitions," defines the Systems Approach to Training (SAT) process and contains five elements that must be included in the SAT training program. Section 1.6.1 of the submittal states the SAT process contains the following elements (among others):

- Analysis of job performance requirements and training needs
- Derivations of learning objectives based upon the preceding analysis.

The CFH training and retraining program description included in the April 15, 2013 (sic), program approval request does not explicitly describe a job performance analysis or the training objectives that were developed as a result of the analysis.

Please describe the job performance analysis used, and the training objectives that were developed as a result.

SCE Response:

SONGS procedure SO23-XXI-TRN, Conduct of Training, directs the use of a systems approach to training to govern the development and implementation of the certified fuel handler (CFH) training program. After SONGS permanently ceased operations, staff performed a CFH job analysis by collecting information from a variety of sources to understand job performance requirements and training needs.

In June 2013, SONGS conducted benchmarking at Kewaunee Power Station and Crystal River Unit 3 and obtained CFH training program descriptions and qualification guides from these facilities. SONGS staff reviewed these documents to gain an understanding of the CFH job and its associated training requirements. Applicable portions of Inspection Procedure 36801, Organization, Management, and Cost Controls at Permanently Shutdown Reactors, were also reviewed to determine appropriate content for the CFH training program.

Additionally, a team of SONGS training and operations staff reviewed the SONGS Unit 1 CFH task list and training program description, which was previously approved by the NRC, and the SONGS Units 2/3 shift manager task list, which was part of the licensed operator training program that was previously accredited by the Institute of Nuclear Power Operations (INPO). The task lists were consolidated and revised to include all of the tasks required to perform the CFH job.

For example, the Unit 1 CFH task list did not include a task for mitigating a malfunction of the component cooling water system. This system is used to cool spent fuel in Units 2 and 3. Thus, the Units 2/3 CFH task list includes a task to direct response to a malfunction of the component cooling water system. This is task number SS-OP-0016 on Attachment 4 of the submission (Request for Approval of the Safe Storage Shift Manager/Certified Fuel Handler Training

Program San Onofre Nuclear Generating Station Units 2 and 3, dated August 20, 2013), page 52 of 57.

As training needs for CFHs arise because of changes to plant systems, procedures, or staffing, SO23-XXI-TRN, Conduct of Training, directs that the task list be updated to reflect changes to the CFH job. Additionally, tasks are identified for continuing training using the DIF process (assigning scores for difficulty, importance, and frequency).

Tasks and their associated lesson plans, which contain the learning objectives for that task, are listed in Attachment 4 of the submission (Request for Approval of the Safe Storage Shift Manager/Certified Fuel Handler Training Program San Onofre Nuclear Generating Station Units 2 and 3, dated August 20, 2013). An example of a learning objective for this program is contained in Attachment 3, page 32 of 57, Corrective Action Program, item #2, "Determine Nuclear Notification (NN) operability and reportability requirements per SO123-XV-52 and SO123-0-A7." The Units 2/3 CFH training program was derived from the Unit 1 CFH training program and the Units 2/3 licensed operator training programs. Thus, the learning objectives for the program had already been developed. Development of new and/or modified learning objectives as a result of changes to the CFH job is prescribed in SO23-XXI-TRN, Conduct of Training.