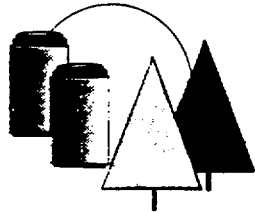


**LADD - -**

**EXHIBIT 2**



*Private Fuel Storage, LLC*

*P.O. Box C4010, La Crosse, WI 54602-4010  
John D. Parkyn, Chairman of the Board*

May 19, 1998

Director  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION  
PRIVATE FUEL STORAGE FACILITY  
DOCKET NO. 72-22 / TAC NO. L22462  
PRIVATE FUEL STORAGE L.L.C.**

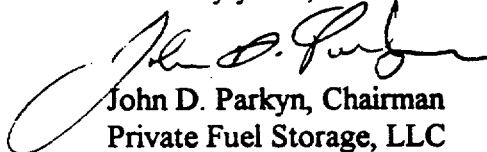
References: 1) NRC Letter, Delligatti to Parkyn, Request for Additional Information,  
dated April 1, 1998  
2) PFSLLC Letter, Parkyn to Director, Office of Material Safety and Safeguards,  
Response to Request for Additional Information, dated April 29, 1998

Please find enclosed Private Fuel Storage responses (original plus 15 copies) to the NRC Request for Additional Information (Ref. 1). A response is provided for each RAI, but as noted in my April 29, 1998 letter (Ref. 2), certain RAIs require supplemental information in accordance with the included schedule.

Some RAI responses contain proprietary information as noted and will be submitted under separate cover with the required affidavit in accordance with 10 CFR 2.790.

If you have any questions regarding this response, please contact me at 608-787-1236 or our Project Director, John Donnell, at 303-741-7009.

Sincerely yours,

  
John D. Parkyn, Chairman  
Private Fuel Storage, LLC

JDP:cls  
Enclosures

cc: Mr. Leon Bear  
Ms. Denise Chancellor  
Mr. Mark Delligatti  
Mr. Jay Silberg

## **CHAPTER 9—CONDUCT OF OPERATIONS**

### **Section 9.3 Training and Certification of Personnel**

- 9-10 (a) Per the requirements of 10 CFR 72.190, describe the operator requirements for the equipment and controls that have been identified as important to safety.
- (b) Per the requirements of 10 CFR 72.192, provide information on the training program to show a systematic approach to training, proficiency testing, and certification of personnel.
- (c) Per the requirements of 10 CFR 72.194, provide information on the program for the certification of the physical condition and the general health of personnel who will operate equipment and controls that are important to safety.

### **RESPONSE**

- (a) For equipment and controls that have been identified as important to safety, a designated check-off list of the required training will be prepared along with the operating procedures. Personnel operating or supervising the operation of equipment or controls important to safety will be certified in such operation. The method of certification will be by an approved training and requalification program maintained by the facility. The prerequisites for procedures effecting equipment and controls important to safety will state specifically that the person performing the procedure must hold the applicable certification.
- (b) The training program will be developed using a job and task analysis to define the various functions which must be performed by different staff members. Each prescribed task will be covered in a training module which will be presented by a person who is qualified to perform the procedure or to train persons on the procedure. The person performing the training will follow a defined curricula which will outline the steps that are required to perform the task. The procedures to be used in performing the task will be used as a basis of the training curricula, so that persons being trained to perform a task (particularly those which are important to safety) will be trained in the precise manner and steps used in performing the task. At the conclusion of task training, proficiency testing will be administered to ensure that proper understanding has been achieved by the person being trained. A test will be prepared and graded by the instructor and will be retained in the facility records for a two year period.

The certification of personnel in functional areas such as fuel handling will be documented in a personnel training file, which will include an outline of the tasks

they are authorized to perform, the date training was provided, the person providing the training, and a certification indicating that a suitable proficiency test was passed. Retraining and refresher training will be provided at intervals that are appropriate to the specific task. Retraining will involve a review of the basic tasks plus special attention to those items within the task which have undergone change. When new equipment is added or modifications in existing equipment of a significant nature are made, procedures will be modified and retraining on the revised procedure and equipment by a qualified instructor will be provided to those persons already certified prior to operation of that equipment.

- (c) The program to ensure the certification of the physical condition and general health of personnel who will operate equipment controls important to safety will require all staff members designated as operators of equipment or controls important to safety to have a physical examination by a licensed physician every two years in accordance with NRC Form 396. Observation of continued fitness-for-duty will be controlled by procedures and training of staff personnel. These procedures and training will include the information necessary to ensure that staff reporting for the performance of work which involves the operation of equipment or controls identified as important for safety are capable of performing such duties without impairment. The procedures and training will include the authority for any trained staff member to deny the right of a person to operate equipment or controls important to safety should they fail to meet the standards of fitness-for-duty. Permanent conditions of staff members that could cause impaired judgment or motor coordination will be considered for accommodation by the physician performing the physical examination using NRC Form 396. Temporary conditions causing impaired judgment or motor coordination will be considered in the procedures as a possible cause for restricted performance of these duties if, in the opinion of trained personnel, further evaluation by a physician is required.