

10 CFR 50.90

August 11, 2014

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

Subject: **Docket No. 50-361 and 50-362
Clarifications Regarding the Implementation of the Certified Fuel
Handler (CFH) Training and Retraining Program
San Onofre Nuclear Generating Station, Units 2 and 3**

Reference: (1) Letter from Andrea L. Sterdis (SCE) to the U.S. Nuclear Regulatory Commission (NRC) dated July 29, 2014, Subject: Clarifications Regarding the Implementation of the Certified Fuel Handler Training and Retraining Program

(2) Letter from P. T. Dietrich (SCE) to the U.S. Nuclear Regulatory Commission (NRC) dated October 21, 2013; Subject: Amendment Application Numbers 265 and 250, Responsibility, Organization, and Qualifications, San Onofre Nuclear Generating Station, Units 2 and 3 (ML 13296A013)

(3) Letter from Mr. Richard J. St Onge (SCE) to the U.S. Nuclear Regulatory Commission (USNRC), dated August 20, 2013, Request for Approval of the Safe Storage Shift Manager/Certified Fuel Handler Training Program, San Onofre Nuclear Generating Station, Units 2 and 3 (ML 13234A024)

Dear Sir or Madam:

By letter dated July 29, 2014, (Reference 1) Southern California Edison (SCE) transmitted to the U.S. Nuclear Regulatory Commission (NRC) clarifications regarding the implementation of the changes to the Technical Specifications (TS) and the Certified Fuel Handler Program transmitted to the NRC by references 2 and 3. Per NRC request, SCE is providing in this letter the same information under Oath and Affirmation.

By letter dated October 21, 2013 (Reference 2), SCE submitted license amendment applications 265 and 250 to operating licenses NPF-10 and NPF-15 for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3, respectively. Amendment

AOO1
NRR

Applications 265 and 250 consist of proposed changes to the Technical Specifications (TS). The proposed TS 5.1, Responsibility, TS 5.2, Organization, and TS 5.3, Staff Qualifications reflect the permanently defueled condition of the plant.

On August 20, 2013, SCE submitted a request for Commission Approval of a Certified Fuel Handler Training Program (Reference 3).

SCE is hereby providing clarifications regarding the implementation of the reference proposed changes to the Technical Specifications (TS) and the CFH Training and Retraining Program. In particular, SCE is offering clarification regarding the implementation of TS 5.3.1.

Training of the unit staff in accordance with proposed Technical Specification 5.3.1 will be consistent with the requirements of the American National Standards Institute (ANSI) in ANSI/N18.1 - 1971, "Selection, and Training of Personnel for Nuclear Power Plants," except for such items that are no longer applicable based upon the permanently shut down and defueled condition of SONGS Units 2 and 3. The following is an example of an exception to ANSI/N18.1-1971. However, exceptions are not limited to this specific example.

- The requirement that the Operations Manager should hold a Senior Reactor Operator (SRO) license at the time of appointment will no longer be applicable.

There are no new regulatory commitments in this letter.

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

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8/11/2014
(Date)

Sincerely,



cc: M. L. Dapas, Regional Administrator, NRC Region IV
M. H. Chernoff, NRC Project Manager, SONGS Units 2 and 3
R. E. Lantz, NRC Region IV, San Onofre Units 2 and 3
G. G. Warnick, NRC Senior Resident Inspector, SONGS Units 2 and 3
S. Y. Hsu, California Department of Public Health, Radiologic Health Branch