



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 18, 2019

Vice President, Operations  
Entergy Nuclear Operations, Inc.  
Indian Point Energy Center  
450 Broadway, GSB  
P.O. Box 249  
Buchanan, NY 10511-0249

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3 – APPROVAL OF  
CERTIFIED FUEL HANDLER TRAINING AND RETRAINING PROGRAM  
(EPID L-2019-LLL-0015)

Dear Sir or Madam:

By letter dated February 8, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17044A004), Entergy (the licensee) submitted a Notification of Permanent Cessation of Power Operations for the Indian Point Nuclear Generating Unit Nos. 2 and 3 (Indian Point 2 and 3). In its letter, Entergy provided notification to the U.S. Nuclear Regulatory Commission (NRC) of its intent to permanently cease power operations no later than April 30, 2020, and April 30, 2021, for Indian Point 2 and 3, respectively.

By letter dated April 15, 2019 (ADAMS Accession No. ML19105A632), Entergy submitted its Certified Fuel Handler (CFH) Training and Retraining Program for Indian Point 2 and 3 to the NRC for approval.

After certifications of permanent cessation of power operations and permanent removal of fuel from the reactor vessel for Indian Point 2 and 3 are submitted in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.82(a)(1)(i) and (ii), and pursuant to 10 CFR 50.82(a)(2), the 10 CFR Part 50 license will no longer authorize reactor operation or placement or retention of fuel in the reactor vessel. As a result, licensed reactor operators will no longer be required to support plant operating activities. Instead, approval of a CFH Training and Retraining Program is needed to facilitate activities associated with decommissioning and irradiated fuel handling and management.

The licensee requested NRC approval of the Indian Point 2 and 3 CFH Training and Retraining Program to ensure that the monitoring, handling, storage, and cooling of irradiated fuel is performed in a safe manner. As defined in 10 CFR 50.2, the CFH is a non-licensed operator who has been qualified in accordance with a fuel handler training program approved by the NRC. Non-licensed personnel are trained in accordance with 10 CFR 50.120.

The NRC staff has reviewed the submittal and, based on the enclosed safety evaluation, approves Indian Point 2 and 3 CFH Training and Retraining Program as requested.

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If you have any questions, please contact me at 301-415-1030 or by e-mail to [Richard.Guzman@nrc.gov](mailto:Richard.Guzman@nrc.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Guzman', with a long horizontal flourish extending to the right.

Richard V. Guzman, Senior Project Manager  
Plant Licensing Branch I  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-247 and 50-286

Enclosure:  
Safety Evaluation

cc: Listserv



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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

CERTIFIED FUEL HANDLER TRAINING AND RETRAINING PROGRAM

ENTERGY NUCLEAR OPERATIONS, INC.

INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3

DOCKET NOS. 50-247 AND 50-286

1.0 INTRODUCTION

By letter dated February 8, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17044A004), Entergy (the licensee) submitted a Notification of Permanent Cessation of Power Operations for Indian Point Nuclear Generating Unit Nos. 2 and 3, (Indian Point 2 and 3). In its letter, Entergy provided notification to the U.S. Nuclear Regulatory Commission (NRC or the Commission) of its intent to permanently cease power operations no later than April 30, 2020, and April 30, 2021, for Indian Point 2 and 3, respectively.

By letter dated April 15, 2019 (ADAMS Accession No. ML19105A632), Entergy submitted its Certified Fuel Handler (CFH) Training and Retraining Program for Indian Point 2 and 3 to the NRC for approval.

After certifications of permanent cessation of power operations and permanent removal of fuel from the reactor vessel for Indian Point 2 and 3 are submitted in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.82(a)(1)(i) and (ii), and pursuant to 10 CFR 50.82(a)(2), the 10 CFR Part 50 license will no longer authorize reactor operation or placement or retention of fuel in the reactor vessel. As a result, licensed reactor operators will no longer be required to support plant operating activities. Instead, approval of a CFH Training and Retraining Program is needed to facilitate activities associated with decommissioning and irradiated fuel handling and management.

The proposed CFH Training and Retraining Program is to be used to satisfy training requirements for the plant personnel responsible for supervising and directing the monitoring, storage, handling, and cooling of irradiated nuclear fuel in a manner consistent with ensuring the health and safety of the public. Section 50.2 of 10 CFR, "Definitions," requires that CFHs be qualified in accordance with an NRC-approved training program.

2.0 REGULATORY EVALUATION

Pursuant to 10 CFR 50.120(b), each holder of an operating license shall establish, implement, and maintain a training program derived from a systems approach to training (SAT) (as defined

Enclosure

in 10 CFR 55.4) providing for the training and qualification of, among other nuclear power plant personnel, non-licensed operators.

Under 10 CFR 50.54(y), at a nuclear power reactor facility for which the licensee has certified that operations have permanently ceased and fuel has been permanently removed from the reactor vessel, a CFH is authorized to approve taking reasonable action that departs from a license condition or a technical specification (TS) in an emergency when this action is immediately needed to protect the public health and safety and no action consistent with license conditions and TS that can provide adequate or equivalent protection is immediately apparent.

In its proposed rule entitled "Decommissioning of Nuclear Power Reactors," published in the *Federal Register* on July 20, 1995 (60 FR 37374), the Commission explained that a CFH at a permanently shut-down and defueled nuclear power reactor undergoing decommissioning has the requisite knowledge and experience to evaluate plant conditions and make such judgements. The final rule published in the *Federal Register* on July 29, 1996 (61 FR 39278), adopted a definition of "certified fuel handler" in 10 CFR 50.2.

The regulatory framework concerning operator and fuel handler staffing was discussed by the NRC in SECY-00-145, "Integrated Rulemaking Plan for Nuclear Power Plant Decommissioning," Attachment 1, "Integrated Rulemaking Plan for Emergency Planning, Insurance, Safeguards, Staffing and Training, and Backfit at Decommissioning Nuclear Power Plants" dated June 28, 2000 (ADAMS Accession No. ML003721626), which states, in part:

The certified fuel handler is intended to be the onshift licensee representative who is not only responsible for safe fuel handling operations at a decommissioning plant, but is always present on shift to ensure the safe maintenance and storage of spent fuel and the overall safety of any decommissioning-related activities at the facility.

In addition, the certified fuel handler must be qualified in accordance with a certified fuel handler training program approved by the Commission. However, there are no regulations besides the definition that specifies the training requirements for the certified fuel handler.

Considering the definition of CFH in 10 CFR 50.2 and the background provided by the July 29, 1996 final rule that added the definition, plus the insights provided in SECY-00-145, the NRC staff determined that an acceptable CFH training program should ensure that the trained individual has the requisite knowledge and experience in spent fuel handling and storage and reactor decommissioning, and is capable of evaluating plant conditions and exercising prudent judgment for emergency action decisions. In addition, since the CFH is defined as a non-licensed operator, the NRC staff also used the criteria in 10 CFR 50.120 and assessed the program against the elements of a SAT provided in the definitions section of 10 CFR 55.4.

Following the issuance of the 1996 decommissioning rule, the NRC staff commenced the review and approval of CFH training programs for permanently shut-down and defueled reactors, consistent with the requirements in the rule. Nuclear power plants that are permanently shut down and defueled would reassess their staffing plans related to decommissioning organization structure; retaining, reassigning, or releasing staff; and meeting minimum staffing requirements in TSs and regulatory required programs (e.g., emergency response organizations, fire brigade, security, etc.). The effort balanced personnel and plant status commensurate with the reduced risk once the certifications associated with permanent cessation of operations and permanent

defueling had been submitted. Included in the effort was the transition from licensed operators to CFHs. With a simplified operating configuration in the permanently shut-down and defueled condition, licensed operators were replaced with CFHs following NRC approval of the CFH training program. Consistent with these changes, the training and requalification programs required by 10 CFR Part 55, "Operators' Licenses," were modified to reflect the reduced staffing levels and responsibilities of the operations staff.

Past practice of the NRC staff included reviewing the proposed CFH training program to confirm that the program was based on a SAT as defined in 10 CFR 55.4.

Examples of such precedents include NRC safety evaluations for Maine Yankee Atomic Power Plant, dated November 26, 1997 (Legacy Library Accession No. 9712040233), and Zion Nuclear Power Station, Units 1 and 2, dated July 20, 1998 (Legacy Library Accession No. 9807240263). In more recent years, the NRC staff has approved CFH training programs for Kewaunee Power Station, dated May 12, 2014 (ADAMS Accession No. ML14104A046); Crystal River Unit 3 Nuclear Generating Plant, dated June 26, 2014 (ADAMS Accession No. ML14155A181); San Onofre Nuclear Generating Station, Units 2 and 3, dated August 1, 2014 (ADAMS Accession No. ML13268A165); Vermont Yankee Nuclear Power Station, dated October 1, 2014 (ADAMS Accession No. ML14162A209); Oyster Creek Nuclear Generating Station; Clinton Power Station, Unit 1; Quad Cities Nuclear Power Station, Units 1 and 2, dated September 6, 2016 (ADAMS Accession No. ML16222A787); and James A. Fitzpatrick Nuclear Power Plant, dated October 17, 2016 (ADAMS Accession No. ML16259A347).

The regulatory requirements and guidance that the NRC staff used in its review of the proposed CFH Training and Retraining Program for Indian Point 2 and 3 are as follows:

- 10 CFR 50.2, which states, in part: 'Certified fuel handler' means, for a nuclear power reactor facility, a non-licensed operator who has qualified in accordance with a fuel handler training program approved by the Commission.
- 10 CFR 50.120, which states, in part:

(b)(2) The training program must be derived from a systems approach to training as defined in 10 CFR 55.4, and must provide for the training and qualification of the following categories of nuclear power plant personnel:

(i) Non-licensed operator.

(b)(3) The training program must incorporate the instructional requirements necessary to provide qualified personnel to operate and maintain the facility in a safe manner in all modes of operation. The training program must be developed to be in compliance with the facility license, including all technical specifications and applicable regulations. The training program must be periodically evaluated and revised as appropriate to reflect industry experience as well as changes to the facility, procedures, regulations, and quality assurance requirements. The training program must be periodically reviewed by licensee management for effectiveness. Sufficient records must be maintained by the licensee to maintain program integrity and kept available for NRC inspection to verify the adequacy of the program.

- 10 CFR 55.4 which states, in part: 'Systems approach to training' means a training program that includes the following five elements:
  - (1) Systematic analysis of the jobs to be performed.
  - (2) Learning objectives derived from the analysis which describe desired performance after training.
  - (3) Training design and implementation based on the learning objectives.
  - (4) Evaluation of trainee mastery of the objectives during training.
  - (5) Evaluation and revision of the training based on the performance of trained personnel in the job setting.

### 3.0 TECHNICAL EVALUATION

The NRC staff reviewed the specific elements of the proposed CFH Training and Retraining Program for Indian Point 2 and 3 against the regulatory requirements of 10 CFR 50.120, consistent with previous NRC staff reviews and approvals of decommissioning reactor CFH training programs, together with the elements of a SAT as defined in 10 CFR 55.4.

#### 3.1 CFH Training Program Broad-Scope Objectives

Based on discussion of the applicable regulatory requirements in Section 2.0 above, the NRC staff used the following three broad-scope objectives as criteria for an acceptable CFH Training and Retraining Program:

- (1) Safe conduct of decommissioning activities.
- (2) Safe handling and storage of spent fuel.
- (3) Appropriate response to plant emergencies.

The proposed CFH Training and Retraining Program for Indian Point 2 and 3, as provided in the attachment to Entergy's letter dated April 15, 2019, was reviewed by the NRC staff. In its submittal, the licensee stated that the approval of a CFH Training and Retraining Program "will be implemented to ensure the monitoring, handling, storage and cooling of nuclear fuel is performed in a manner consistent with ensuring the public health and safety."

Section 1.1.2., "Fundamentals Training," states that the fundamentals training phase of the CFH Training and Retraining Program consists of lecture and/or self-study of several topics appropriate to the monitoring, handling, storage, and cooling of spent nuclear fuel. The selection of topics will be based on a job analysis for the CFH tasks and functions. The fundamentals topics will include thermodynamics, heat transfer, fluid mechanics, radiological safety principles and monitoring, facility/system design and function, and facility administrative and safety procedures, as appropriate for the current plant status.

As described in Subsection 1.1.3, "On-The-Job Training (OJT)," the OJT phase of the CFH Training and Retraining Program will include hands-on training of shift operations such as shift turnover, shift record keeping, removal and return of equipment to service, and specified watch standing activities. The OJT will also include training on the facility license; emergency plan; and the content, bases, and importance of the facility's TSs. The NRC staff finds the inclusion

of these topics in the initial training program to appropriately address the safe conduct of decommissioning activities. The proposed CFH initial training program also includes lectures and/or self-study of topics appropriate to the monitoring, handling, storage, and cooling of nuclear fuel, including topics on thermodynamics, heat transfer, fluid mechanics, electrical theory, and mechanical components operation. The OJT phase of the CFH Training Program includes watch-standing activities such as operation of systems/components used to provide handling, storage, cooling, and monitoring of fuel. The NRC staff finds the inclusion of this information to appropriately address the safe handling and storage of spent fuel.

Further, the OJT phase of the proposed CFH initial training program includes training on normal, abnormal, and emergency procedures, accident analysis, and the facility's emergency plan. The NRC staff finds that the inclusion of this information adequately addresses the appropriate response to plant emergencies.

Section 1.2, "Retraining Program," states that the retraining program shall be administered in a biennial training cycle. This cycle will include annual operating examinations and biennial written examinations. This section also states that all CFHs will participate in the retraining program. The CFH retraining phase will consist of lectures and/or self-study of topics appropriate to the monitoring, handling, storage, and cooling of nuclear fuel. The content of the retraining program will be based on the tasks selected during program development for the retraining cycle. Retraining will typically include a review of changes associated with the facility and procedures, as well as problem areas associated with the monitoring, handling, storage, and cooling of nuclear fuel, and selected topics from the initial training program. The NRC staff finds the inclusion of these topics in the retraining program to be consistent with the broad-scope objectives.

Based on the above, the NRC staff concludes that the proposed CFH Training and Retraining Program for Indian Point 2 and 3 addresses the three broad-scope objectives of the safe conduct of decommissioning activities, safe handling and storage of spent fuel, and the appropriate response to plant emergencies.

### 3.2 CFH Training and Retraining Program Evaluation

The NRC staff reviewed the specific elements of the proposed CFH Training and Retraining Program for Indian Point 2 and 3 against the regulatory requirements of 10 CFR 50.120(b)(2) and (b)(3), consistent with previous NRC staff reviews and approvals of decommissioning reactor CFH training programs, and has summarized the results of this review below.

#### 3.2.1 Use of a SAT

Section 50.120(b)(2) of 10 CFR, states, in part: "The training program must be derived from a SAT as defined in 10 CFR 55.4...." The licensee stated in its letter dated April 15, 2019: "The training plan will adhere to the guidelines of NUREG-1220, 'Training Review Criteria and Procedures, Revision 1,'<sup>1</sup> that are applicable to a permanently defueled facility and be developed utilizing the SAT process."

Section 1, "Introduction," of the proposed Indian Point 2 and 3 CFH Training and Retraining Program states, in part:

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<sup>1</sup> NUREG-1220, Revision 1, "Training Review Criteria and Procedures," dated January 1993 (ADAMS Accession No. ML102571869)

The Certified Fuel Handler Training and Retraining Program contained herein describes the training program to be implemented at Indian Point Nuclear Generating Unit Nos. 2 and 3 ... to ensure the monitoring, handling, storage and cooling of nuclear fuel is performed in a manner consistent with ensuring the public health and safety.

The program describes the personnel to whom the program applies, the areas in which training is provided, what constitutes certification, how certification is maintained, and required qualifications (e.g., medical).

The NRC staff reviewed the proposed CFH Training and Retraining Program to ensure that it includes all five of the required elements of a SAT-based program, which are:

- (1) Systematic analysis of the jobs to be performed.
- (2) Learning objectives derived from the analysis that describe desired performance after training.
- (3) Training design and implementation based on the learning objectives.
- (4) Evaluation of trainee mastery of the objectives during training.
- (5) Evaluation and revision of the training based on the performance of trained personnel in the job setting.

Section 1.1, "Initial Training Program," of the proposed Indian Point 2 and 3 CFH Training and Retraining Program states that the selection of topics for the fundamentals training phase of the program will be based on a job analysis for the CFH tasks and functions. The job analysis will be performed by an individual holding a Senior Reactor Operator (SRO) license at the facility. A Difficulty, Importance and Frequency (DIF) rating will be assigned to each CFH task by a holder of an SRO license who is familiar with the expected plant conditions during decommissioning. A review of the DIF ratings for each task will be performed by operations and training personnel and management. Learning objectives will be derived from the analysis to describe the desired performance after training. Training materials will be designed based on the learning objectives.

Fundamental training topics will include thermodynamics, heat transfer, fluid mechanics, radiological safety principles and monitoring, electrical theory, mechanical components operation, facility/system design and function, and facility administrative and safety procedures. The training plan will adhere to the guidelines of NUREG-1220, Revision 1, which are applicable to a permanently defueled facility and will be developed utilizing the SAT process. Entergy procedures provide specific guidance on training design and implementation such as guidance on training program oversight, administration, analysis of training needs, development of lesson objectives and lesson plans, design and development of training materials, conduct of training, evaluation of training effectiveness, and record keeping. The NRC staff finds the licensee's plan to use these procedures to conduct a systematic analysis of jobs to be performed and to derive learning objectives from that analysis is consistent with SAT elements 1 and 2.

Section 1.2, "Retraining Program," of the proposed CFH Training and Retraining Program states that all CFHs will participate in the retraining program. The content of the retraining program will be based upon the tasks selected during program development for the retraining cycle. A



retraining plan will be developed and approved by the Site Director (or designee). The training plan adheres to the guidelines of NUREG-1220, Revision 1, which are applicable to a permanently defueled facility and will be developed utilizing the SAT process.

The NRC staff finds this approach to be consistent with SAT elements 1 and 2.

SAT element 3 requires that the training design and implementation be based upon the learning objectives. Section 1.2.2 of the proposed CFH Training and Retraining Program states that training materials will be designed based on the learning objectives.

The Indian Point 2 and 3 training plan will adhere to the guidelines of NUREG-1220, Revision 1, which are applicable to a permanently defueled facility and will be developed using the SAT process.

The NRC staff reviewed the licensee's process to design and implement training based upon the learning objectives and finds it to be consistent with SAT element 3.

Section 1.1.4. of the proposed CFH Training and Retraining Program for Indian Point 2 and 3 states that a comprehensive final exam shall be administered at the end of the initial training program. The comprehensive examination shall include a written examination and an operating examination. The written examination requires a minimum score of 80 percent to pass. The operating examination will consist of Job Performance Measures (JPMs). Passing criteria for an individual JPM is that the examinee successfully completes the assigned task in accordance with the governing procedure without missing any critical steps. The critical steps for a JPM will be pre-identified as defined in NUREG-1021, Revision 11, "Operator Licensing Examination Standards for Power Reactors, Final Report," (ADAMS Accession No. ML17038A432) or later, revision. The operating examination requires passing a minimum of 80 percent of the administered JPMs to pass. Section 1.2.4, of the proposed Indian Point 2 and 3 CFH Training and Retraining Program states that participants in the CFH retraining program must pass a biennial written examination and an annual operating examination to maintain their qualification. The written examination requires a minimum score of 80 percent to pass. The operating examination will consist of JPMs, and each JPM will be scored on a pass/fail basis.

Entergy procedures provide specific guidance on training design and implementation such as guidance on training program oversight, administration, analysis of training needs, development of lesson objectives and lesson plans, design and development of training materials, conduct of training, evaluation of training effectiveness, and record keeping.

The NRC staff reviewed the licensee's process to evaluate the trainee mastery of the objectives during training and retraining and finds it to be consistent with SAT element 4.

Section 1.3, "Program Evaluation," of the Indian Point 2 and 3 CFH Training and Retraining Program states that routine assessments of the effectiveness and accuracy of the training are conducted by appropriate management personnel during and at the end of each 2-year training cycle. Evaluation results shall be reviewed by a station oversight board as defined in site procedures. The station oversight board will verify the resolution of any discrepancies identified by the evaluation. Any required changes as determined by the station oversight board shall be incorporated into the program.

The NRC staff reviewed the licensee's process to evaluate and revise the training based on the performance of trained personnel and finds it to be consistent with SAT element 5.

Based on the above, the NRC staff concludes that the proposed CFH Training and Retraining Program includes the five elements of 10 CFR 55.4 and thus complies with 10 CFR 50.120(b)(2).

### 3.2.2 Compliance with the Requirements of 10 CFR 50.120(b)(3)

The NRC staff also verified that the proposed CFH Training and Retraining Program meets the requirements of 10 CFR 50.120(b)(3). Specifically, 10 CFR 50.120(b)(3) requires that the training program:

- a. incorporate the instructional requirements necessary to provide qualified personnel to operate and maintain the facility in a safe manner in all modes of operation;
- b. be developed to be in compliance with the facility license, including all technical specifications and applicable regulations;
- c. be periodically evaluated and revised, as appropriate, to reflect industry experience as well as changes to the facility, procedures, regulations, and quality assurance requirements;
- d. be periodically reviewed by licensee management for effectiveness; and
- e. ensure the licensee maintains and keeps available sufficient records to maintain program integrity and allow for NRC inspection to verify the adequacy of the program.

The NRC staff reviewed the proposed CFH Training and Retraining Program for Indian Point 2 and 3 and confirmed that each of the 10 CFR 50.120(b)(3) requirements is satisfied as discussed below.

Section 1.1.2, "Fundamentals Training," states that the job analysis will be conducted by an individual holding an SRO license. Learning objectives will be derived from the analysis to describe the desired performance after training, and training materials will be designed based on the learning objectives.

Section 1.1.4, "Candidate Evaluation," states that a comprehensive final examination must be administered at the end of the initial training cycle consisting of a written examination and an operating examination described in Appendices A and B, respectively. Further, Section 1.2.3, "Course Schedule," states that the CFH Retraining Program shall be administered in a biennial training cycle. This cycle includes annual operating examinations and biennial written examination. Biennial and annual are as defined in NUREG-1021, Revision 11, or later revision. Appendices A and B of the proposed CFH Training and Retraining Program provide a compendium of instructional areas that the licensee has identified as required instructional areas necessary to ensure that the CFHs will be trained in all areas necessary to maintain the facility and operate equipment in a safe manner. The NRC staff finds that this satisfies element "a" above.

Section 1, "Introduction," states, in part, that the training program will adhere to the guidelines of NUREG-1220, Revision 1, which are applicable to a permanently defueled facility, shall comply with the Indian Point TSs, and be consistent with the level of hazard at the facility and ensure that the facility is maintained in a safe and stable condition. Section 1 further states that candidates in the training program shall meet minimum applicable operator experience

requirements of the facility TSs. The NRC staff finds that this is consistent with element “b” above.

Section 1.3, “Program Evaluation,” states that routine assessments of the effectiveness and accuracy of the training program are conducted by appropriate management personnel during and at the end of each 2-year training cycle. The evaluation results shall be reviewed by a station oversight board as defined in site procedures. The station oversight board will verify the resolution of any discrepancies identified by the evaluation. Any required changes to the program determined by the Entergy station oversight board shall be incorporated into the program. The NRC staff reviewed the provisions for evaluating and revising the CFH Training and Retraining Program and finds that they satisfy the program evaluation requirements of elements “c” and “d” above.

Section 1.4, “Records Retention,” states that records associated with the proposed CFH Training and Retraining Program will be retained in a retrievable format until there is no longer a need for the CFH position at the facility (i.e., when all fuel is permanently transferred to a dry fuel storage facility). Further, Section 1.5, “Evaluating Changes to the CFH Training and Retraining Program,” states that changes may be made to the training program elements without NRC approval as long as the following are applicable: (1) suitable proficiency in the performance of the program’s activities is maintained and (2) changes are documented in an accessible manner that will allow the NRC to verify the adequacy of the program in accordance with 10 CFR 50.120. The NRC staff finds that this is consistent with element “e” above.

#### 4.0 CONCLUSION

Based on its review of the proposed CFH Training and Retraining Program for Indian Point 2 and 3, the NRC staff determined that the program adequately addresses the safe conduct of decommissioning activities, the safe handling and storage of spent fuel, appropriate response to plant emergencies, and is consistent with the SAT processes defined by 10 CFR 55.4 and the requirements of 10 CFR 50.120(b)(2) and (b)(3). Based on the above findings, the NRC staff approves the CFH Training and Retraining Program for Indian Point 2 and 3 pursuant to 10 CFR 50.2. Because the program is based on SAT, the licensee may change elements of the program without NRC approval as long as the following are applicable:

- (1) Suitable proficiency in the performance of the program’s activities is maintained.
- (2) Changes are documented in an accessible manner that will allow the NRC to verify the adequacy of the program in accordance with 10 CFR 50.120.

Principal Contributor: M. Keefe-Forsyth

Date: December 18, 2019

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**ADAMS Accession No.: ML19333B868**

\*by memorandum

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