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James A. Kay
Manager, Nuclear Regulatory Affairs

November 19, 2015

10 CFR 50.90

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

Subject: Docket Nos. 50-361 and 50-362
Response to a Request for Additional Information regarding Amendment Applications 270 and 255
Proposed Changes to Specific Regulatory Guide Commitments San Onofre Nuclear Generating Station, Units 2 and 3

References: 1) Letter from T. J. Palmisano (SCE) to the U. S. Nuclear Regulatory Commission (NRC) dated August 20, 2015; Subject: Docket Nos. 50-361 and 50-362, Amendment Applications 270 and 255, Proposed Changes to Specific Regulatory Guide Commitments, San Onofre Nuclear Generating Station, Units 2 and 3 (ADAMS Accession No. ML15236A018)

2) Letter from M. Vaaler (NRC) to the T. J. Palmisano (SCE) dated November 12, 2015; Subject: San Onofre Nuclear Generating Station, Units 2 and 3 – Request for Additional Information Regarding the License Amendment Request to Make Changes to Specific Regulatory Guide Commitments Related to the Implementation of "Cold and Dark" Status (ADAMS Accession No. ML15314A321)

Dear Sir or Madam:

By letter dated August 20, 2015 (Reference 1), Southern California Edison (SCE) submitted a License Amendment Request (LAR), consisting of Amendment Applications Nos. 270 and 255, to Facility Operating License Numbers NPF-10 and NPF-15 for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3, respectively. The LAR proposed to revise the Updated Final Safety Analysis Report (UFSAR) to revise specific Regulatory Guide commitments.

By letter dated November 12, 2015 (Reference 2), the NRC provided a Request for Additional Information (RAI) regarding Reference 1. The response to the RAI is contained in the enclosure to this letter.

A007
NRR

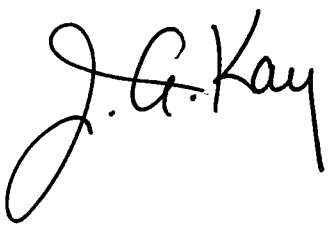
P. O. Box 128
San Clemente, CA 92672

The additional information provided in the enclosure does not affect the conclusions of the No Significant Hazards Consideration or the Environmental Consideration provided in Reference 1.

There are no new regulatory commitments in this letter or the Enclosure.

If you have any questions or require any additional information, please contact me at (949) 368-7418.

Sincerely,



Enclosure: Response to NRC Request for Additional Information

cc: M. L. Dapas, Regional Administrator, NRC Region IV
M. G. Vaaler, NRC Project Manager, SONGS Units 2 & 3
S. Y. Hsu, California Department of Public Health, Radiologic Health Branch

SONGS SPENT FUEL POOL ISLAND LAR
DRAFT RAI RESPONSES

RAI-SBPB -01: Makeup Water for Leakage Events

A. Describe how leakage through the spent fuel pool liner resulting from the design basis cask drop and light load handling accidents would be managed. Address the actions specified in procedures to reduce or eliminate leakage through the leak collection system and the resulting time available to provide makeup water. Provide justification for the quality classification of the makeup sources based on the time available for makeup for leakage events.

SONGS Response

"Describe how leakage through the spent fuel pool liner resulting from the design basis cask drop and light load handling accidents would be managed:"

The cask loading area of the pool was designed for a cask drop, and calculations conclude that the liner would not be penetrated (Reference 2 and 6). The SONGS UFSAR (Section 9.1.2.2) states in part that "The cask loading area of the Spent Fuel Storage Pool is designed to withstand the impact loading of a dropped fuel shipping cask from a maximum height of 28 feet 6 inches".

The SONGS UFSAR also notes that "Control of liquid leakage from SFP is maintained by a system of leak chases which are placed behind the spent fuel pool liner plates. The leak chases are connected to drain lines that terminate in the leak detection sump. Observance of leakage from a drain line will allow identification of the general location of the leak" (Reference 4).

Analyzing the cask handling area for potential drops is appropriate even though the Cask Handling Crane was upgraded to a 'Single Failure Proof' design (Reference 1). While the crane is Single Failure Proof, the transfer cask containing the multi-purpose canister could be postulated to drop when they are placed on the upper shelf of a cask pool for lifting yoke change-out. Yoke change-out is required because of the vertical clearance differences. During this evolution, the transfer cask and canister are not fully restrained and are postulated to fall back into the lower portion of the cask pool if an earthquake occurs or it is otherwise tipped back into the pool area.

The new fuel and spent fuel storage areas are not exposed to overhead handling of the spent fuel cask (Reference 3).

SONGS Procedure SO23-3-2-11, "Spent Fuel Pool Operations" provides requirements for handling of loads over the Spent Fuel Pool (Reference 5), and load drop accidents were evaluated in the UFSAR Chapter 15 (Reference 6). Substantial precautions are in place to preclude drops and leaks (including but not limited to safe-load paths, lift height limits, and other administrate and physical barriers). If leakage occurs the leak chase drains would be monitored to locate the leak. SFP makeup would be initiated using the existing installed system or any available mitigating strategy flow paths.

"Address the actions specified in procedures to reduce or eliminate leakage through the leak collection system and the resulting time available to provide makeup water:"

Any leaks (from corrosion or other causes) into a leak chase would be limited to approximately 50 gpm based on their cross-sectional area. Such leaks would be expected to start much slower and be detected well before reaching even that flow rate, which is well-within SFP make-up capability. Finally, such small leaks can be mitigated by shutting the leak chase drain valves if and when it was appropriate to do so.

SONGS procedure SO23-3-2.11 governs the normal operation of the Spent Fuel Pool (SFP). Attachment 21 provides 'REQUIREMENTS' for monitoring SFP temperature, level, and limiting loads over the SFP racks (Reference 5). If REQUIREMENTS are not met, then, Operations suspends all activities involving SFP decay heat load, AND monitors temperatures, AND initiates actions to restore the components. If a leak is identified in the Cask Pool area, there is an isolation gate that can be slid into place and its inflatable seal pressurized in accordance with Attachments 8 or 9.

SONGS Procedure SO23-13-23, **"Loss of Spent Fuel Pool Cooling" includes the potential event of "Loss of SFP Inventory"** (Reference 7). Should SFP level drop, **Section 2 provides actions and 'actions if response not obtained.'** These include placing any suspended fuel assembly in a safe position, suspending all fuel movement, initiating SO23-13-20, **"Abnormal Operating Instruction, Fuel Handling Accidents or Loss of SFP Level Control" (Reference 8),** verifying siphon breaker is covered, and monitoring/restoring boron concentration. Exit conditions from this procedure are SFP **Level > 23', SFP cooling restored, SFP temperature <140 Degrees F and stable, and** powered from Offsite Power (Exit Conditions Section).

SONGS SO23-13-20 "**Abnormal Operating Instruction, Fuel Handling Accidents or Loss of SFP Level Control**" (Reference 8) specifies similar corrective actions for loss of level.

SONGS SO23-V-5.100 "**Songs Mitigating Strategies**" (Reference 9) provides multiple options for providing SFP Makeup, depending on the circumstances that resulted in entering the procedure (i.e., Fire, Security issue, mechanical loss of inventory, etc.).

"Provide justification for the quality classification of the makeup sources based on the time **available for makeup for leakage events:"**

The requirements for Safety Classification were compared to the requirements specified in 10 CFR 50.2. The criteria in the definition no longer apply. The systems are not necessary to: (1) maintain the integrity of the Reactor Coolant System, (2) are not required to assure the capability to shut down the reactor or maintain it in a safe-shutdown condition; or (3) are not required to mitigate the consequences of accidents which could result in potential offsite exposures comparable to the applicable guideline exposures set forth in 50.34(a)(1) or 100.11 of this chapter. This is based on the fact that the SONGS Unit 2 and 3 fuel has been cooling for more than three years and 10 months and the cooling load has been reduced by more than ninety percent. The significantly reduced heat load has resulted in at least four days to reach 200 degrees F with no actions taken and approximately a week to reach boiling (Reference 10). This is a dramatic change from normal plant operation in which the SFP would have reached 200 degrees in a matter of a few hours. While the lower decay heat more directly applies to a loss of cooling: a loss of level similarly has a longer response time The calculations performed and reviewed by the NRC Staff to support the Post

Defueled Emergency Plan (PDEP) demonstrate that even beyond design basis catastrophic losses of inventory can be readily mitigated prior to exceeding established thresholds. The Safety Evaluation for the PDEP LAR states in part: "The NRC staff finds that the licensee's planned SFP cooling and makeup water availability conforms to the capabilities assumed for the NRC staff's analysis presented in NUREG-1738 (Reference 11)." Thus the Augmented Quality classification was considered appropriate for the SFP Cooling and Makeup systems.

SCE is currently modifying the facility to establish a Seismic Category I source and mechanical system by upgrading the SFP Makeup System (which provides makeup from the Seismic Primary Water Storage Tanks). Procedure SO23-V-5.100 "SONGS Mitigating Strategies" (Reference 9) provides several methods of providing SFP Makeup which can be accomplished with minimum staffing, procedures and equipment on-site in a matter of hours (Reference 12).

B. Provide a diagram of the spent fuel handling building identifying: 1) the location of the pools; 2) the location of permanent makeup lines; 3) the location of standpipe connections that could be used for makeup; and, 4) the path(s) designated within the fuel handling building for SFP makeup water addition using hoses from the various alternate makeup sources.

SONGS Response

Attachment 1 includes sketches depicting the requested information and related pictures of key equipment and staged resources for illustration.

The SFP Makeup Modification currently being installed also adds a connection from the Fire System to the Makeup injection line which eliminates the need to enter the pool operating floor to access the hose cabinets. It also provides an additional nozzle outside the Fuel handling Building on the east road that will enable outside sources of water to enter the makeup injection line without staging any internal hoses or accessing the pool operating floor.

C. Considering the large number of potential makeup sources reliant on the decommissioning Quality Class III electric electrical distribution system, explain the extent of testing and preventive maintenance that would be applicable to the identified engine-driven and gravity makeup sources (i.e., the diesel fire water pump, sources identified for mitigating strategies, and the portable fire water pump).

SONGS Response

SONGS Procedure SO23-3-3.36 describes Fire Suppression system testing including Electric Fire Pumps, Diesel Fire Pumps and Fire Water Flow-paths (Reference 13). SONGS Procedure SO23-I-2.18 describes periodic testing of the Diesel Fire Pump Batteries (Reference 14). These pumps can be used to deliver makeup water from a variety of sources, including the Demineralized Water Storage Tanks located at a higher elevation on the south side of the plant. Attachment 2 Contains a summary of the testing performed on the pumps and associated Mitigating Strategy Equipment.

RAI-SBPB -02: Attached Systems

Systems connected to the spent fuel pool, such as the cooling and permanent make-up water addition systems, may contribute to inadvertent drainage. Section 9.1.3 of the SONGS Updated Final Safety Analysis Report described that anti-siphon devices and check valves provided protection against inadvertent drainage, and these features are within the scope of SONGS **Technical Specification 4.3.2, "Drainage." The enclosure to SCE's** amendment request states that related fuel pool structural components remain safety-related, Seismic Category I, but the fuel pool cooling system is described as Seismic Category III and quality Class III or Class III AQ. Clarify the seismic design and quality class specifications for the portions of the cooling and makeup systems directly connected to the spent fuel pool that have a function to limit inadvertent or accidental drainage. Also, clarify the scope of quality assurance measures that will be maintained for equipment with the Quality Class III AQ designation.

SONGS Response

Clarify the seismic design and quality class specifications for the portions of the cooling and makeup systems directly connected to the spent fuel pool that have a function to limit inadvertent or accidental drainage.

The Fuel Handling Building and SFP liner, transfer tube including the valve (110) and the new Fuel pool drain valve (109 – locked closed) are "Quality Class II and Seismic Category I (Reference 15).

The proposed Independent SFP Cooling System discharges through the Spent Fuel Pool Cooling System discharge line, which has existing siphon protection

The proposed Independent SFP Cooling System independently takes suction from the Spent Fuel Transfer Pool through a pipe that extends from the operating floor down to the same elevation as the existing Spent Fuel Pool Cooling Suction Line.

For elevation details, please refer to Attachment 3 **"Spent Fuel Pool Level Correlation** Chart," **which is a reproduction of the applicable portions of Attachment 7 to Reference** 16. It relates various alarm and equipment elevations to the Technical Specification limits above stored fuel and standard plant elevations for ease in locating the various values and completeness.

SONGS Response

Also, clarify the scope of quality assurance measures that will be maintained for equipment with the Quality Class III AQ designation.

The SONGS Q-List (90034) is currently located in Appendix 3.2A of the UFSAR. Table 1 (included as Attachment 4) is a list of the 10 CFR 50 Appendix B Criteria applied to structures, system and components designated as AQ (Augmented Quality). There are four general categories of AQ equipment (fire, security, radiation monitors and Spent Fuel Pool Cooling and Make-up (Column D). Thirteen of the eighteen Appendix B Criteria apply to the extent noted. Those indicated as N/A should be understood to not require full

Appendix B controls. However, more appropriate criteria are established and implemented.

RAI-SBPB -03: Island Spent Fuel Pool Cooling System

Clarify how the drainage prevention requirement of Technical Specification 4.3.2 will be satisfied by the ISFPCS. Specifically, either describe that the system is not connected to any piping that extends to within 23 feet of the top of the stored fuel or provide a drawing and describe how any leakage from the primary loop would be returned to the spent fuel pool.

SONGS Response:

SONGS Defueled Technical Specification 4.3.2 States: "The spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining of the pool below Technical Specification 3.1.1 value (23 feet above the top of irradiated fuel assemblies seated in the storage racks)" (Reference 17). The system is not connected to any piping that extends to within 23 feet of the top of the stored fuel other than the discharge line which includes an appropriate siphon break. As noted in the response to RAI-SBPB-02 the suction lines are independent but are slightly (<1 foot) below the Technical Specification level to support cooling throughout the allowed range.

No changes are being made to the Fuel Handling building or interconnected piping below the Technical Specification water level. As described above, procedures are in place for Operations to monitor level, pressure, and temperature of the SFP. Procedures are in place to operate and maintain the existing SFP Cooling equipment as well as the proposed Independent SFP Cooling System equipment. Procedures are in place to utilize several alternative methods of providing SFP Makeup using the Fire Protection System, Service (city) Water System, DWST tank located in the North Industrial Area (NIA), Makeup Demineralizer Tanks in the South yard, and connections for Fire Department sources.

REFERENCES:

1. SONGS Unit 2 and 3 UFSAR as Updated, Section 9.1.4.1.3.1.E,
2. SONGS Calculation C-259-01.02.07, Revision 2, Sheet 17 of 39 (Cask Calculation)
3. SONGS Unit 2 and 3 UFSAR as Updated, Section 9.1.4.3.2.G
4. SONGS Unit 2 and 3 UFSAR as Updated, Section 9.1.2.2 & 3 (Control of Leakage)
5. SONGS Station Procedure SO23-3-2.11 Revision 43, Section 6 and Attachment 15, and Attachment 21
6. SONGS Unit 2 and 3 UFSAR as Updated, Section 15.7.3.4, 5, 6, and 7
7. SONGS Station Procedure SO23-13-23 Revision 18, Section 2
8. SONGS Station Procedure SO23-13-20 Revision 14
9. SONGS Station Procedure SO23-V-5.100 Revision 14,
10. SONGS calculation N-0220-037, Spent Fuel Pool Time to Boil
11. NRC Letter dated 06/04/15, SONGS Unit 1,2,3, and ISFSI, Exemptions from certain Emergency Planning Requirements (Safety Evaluation Sections 3.1.5, 3.2.1, & 3.2.1.1)
12. SONGS Emergency Response Organization On-Shift Staffing Analysis for Mitigating Strategies for Catastrophic Loss of Spent Fuel Pool Water Inventory, Revision 1, March 2015
13. SONGS Station Procedure SO23-3-3.36 "Fire Suppression System Tests", Revision 38
14. SONGS Station Procedure SO23-I-2.18, Surveillance Requirement Weekly Diesel Fire Pump Battery Inspection, Revision 19
15. SONGS Unit 2 and 3 UFSAR as updated, Appendix 3A, "90034, Section 9.1.2 and 9.1.4
16. SONGS Station Procedure SO23-3-2.11.1, Revision 26, "SFP Level Change and Purification Crosstie Operations"
17. SONGS Defueled Technical Specification 4.3.2

ATTACHMENT 1

SUPPORTING SKETCH AND PICTURES

SONGS FUEL HANDLING BUILDING

SFP Makeup Enters the SFP through the existing SFP Cooling Pump Suction Line

Cask Pool (Additional 1" Plate on floor)

Fire Protection Hose Cabinets (2)

Fire Protection Riser

NEW SFPCI Equipment Area

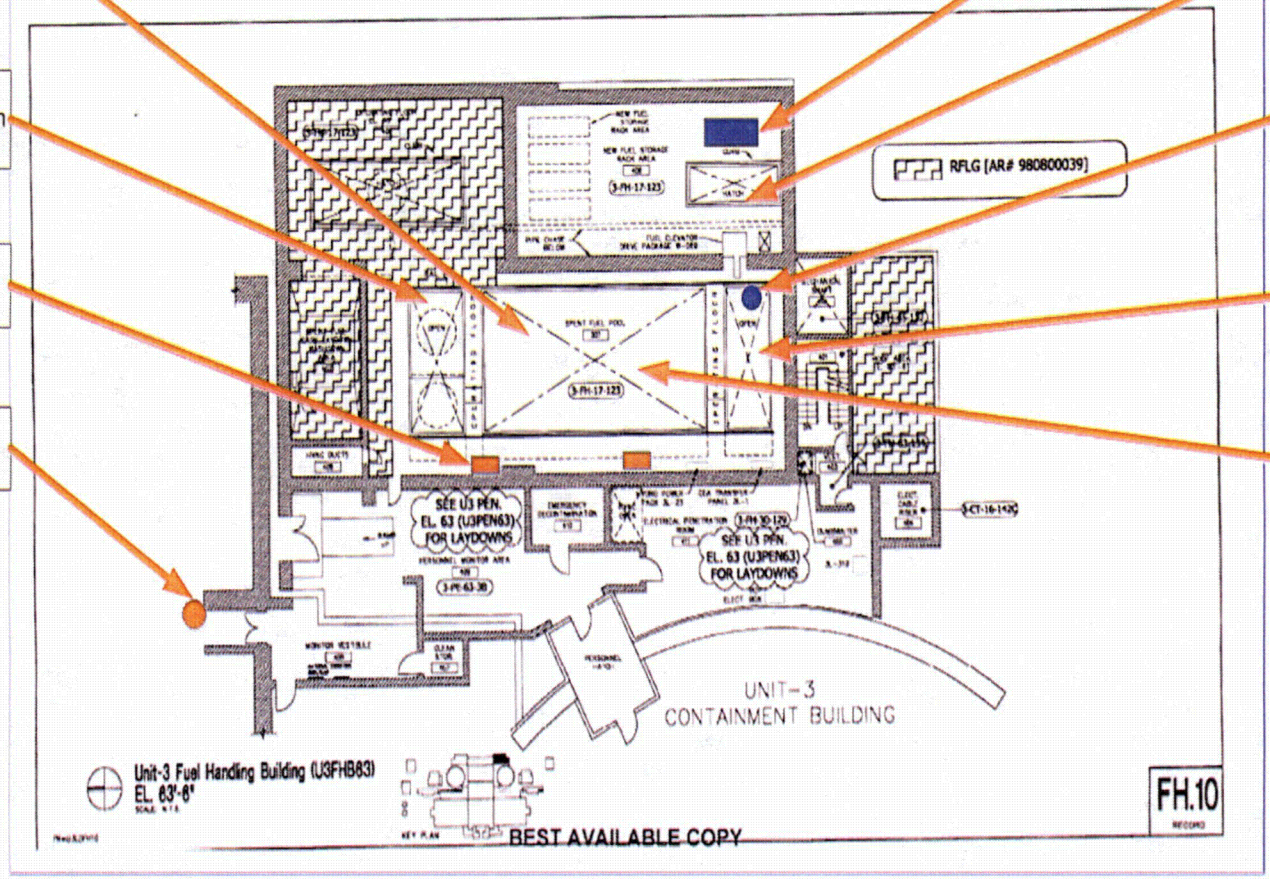
Hatch to Rail Alcove below

Suction line for new SFP Cooling Island

Transfer Pool

Spent Fuel Pool

UNIT 3 OUTAGE LAYDOWN AREA MAPS



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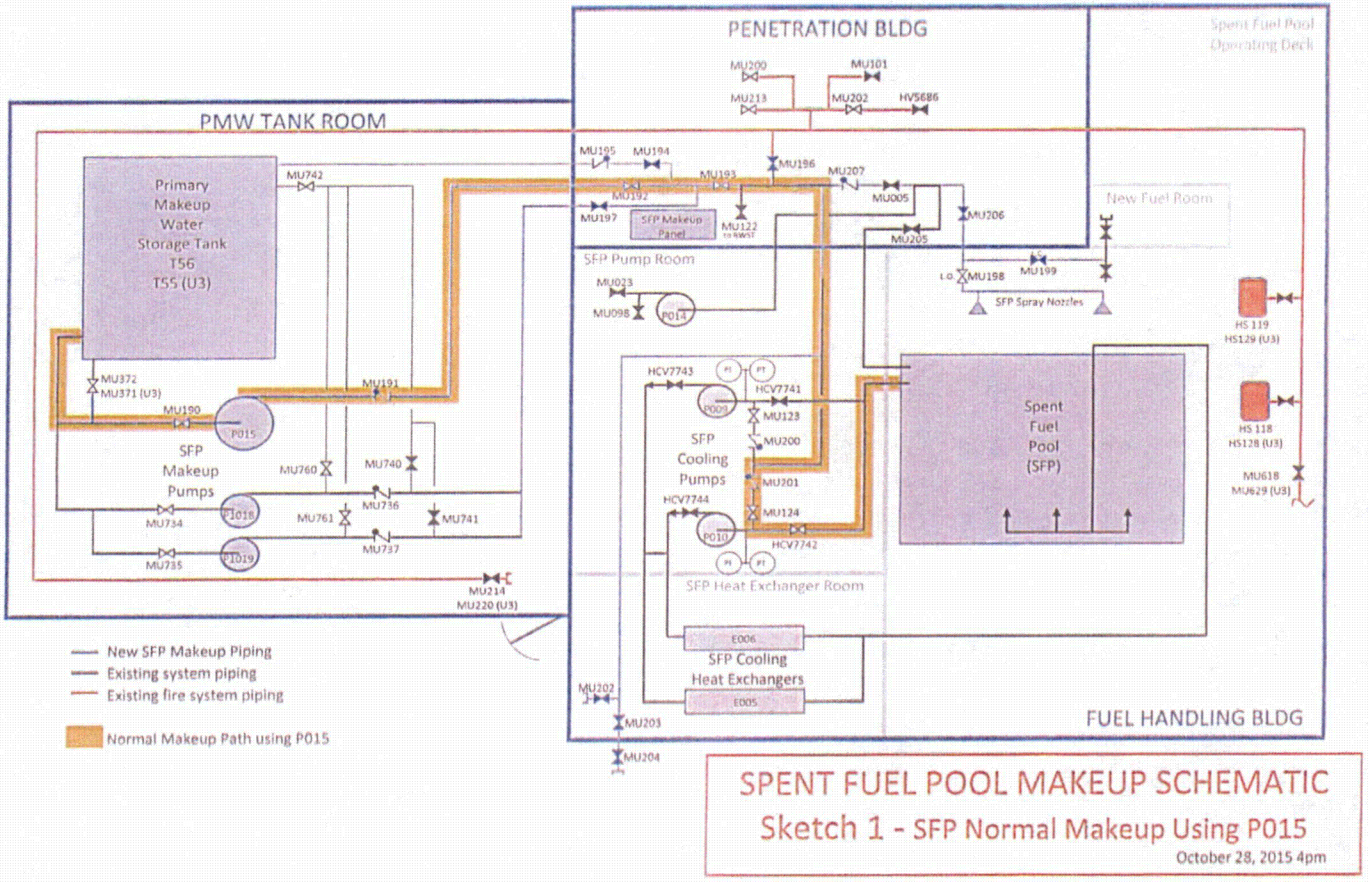


SPENT FUEL POOL MAKEUP SCHEMATIC

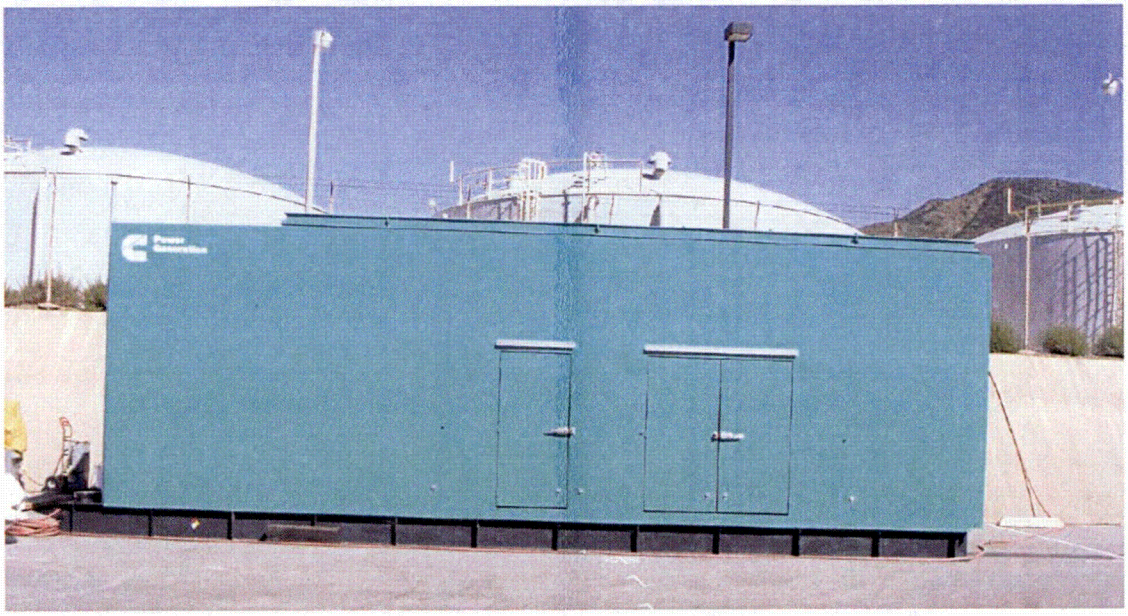
Sketch 1 - SFP Normal Makeup Using P015

October 28, 2015 4pm

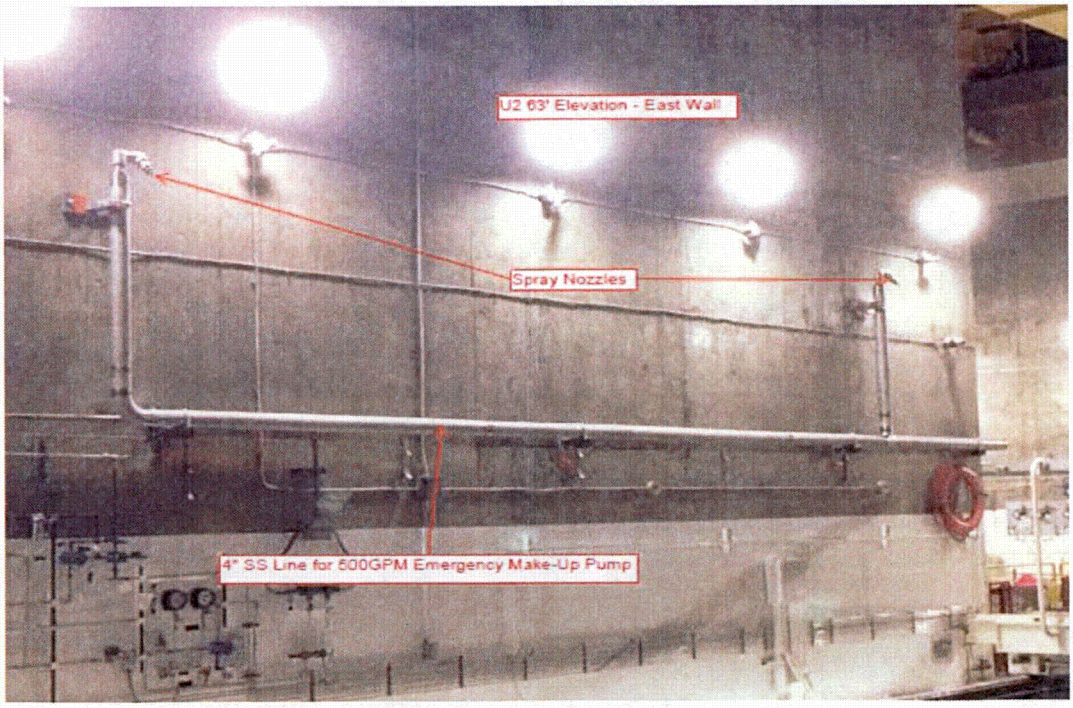
SONGS PHOTOGRAPHS Related TO SFPMU AND POWER

1500 KW Standby Generator - Base

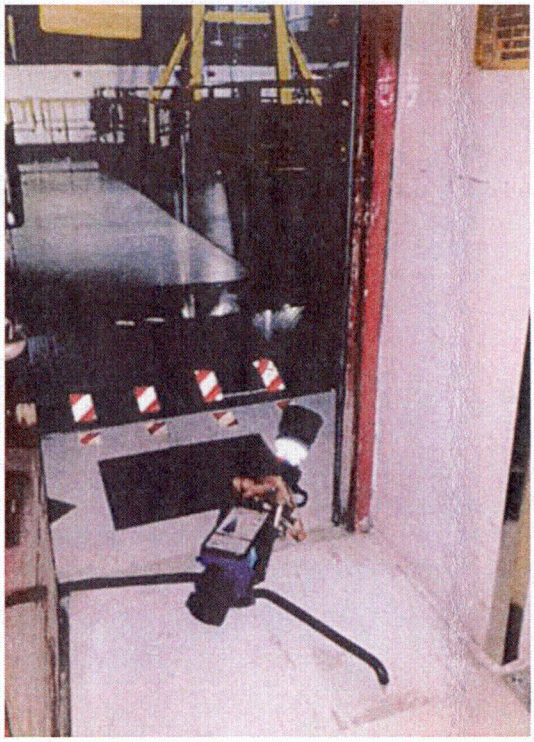
1500 KW Standby Generator – Base



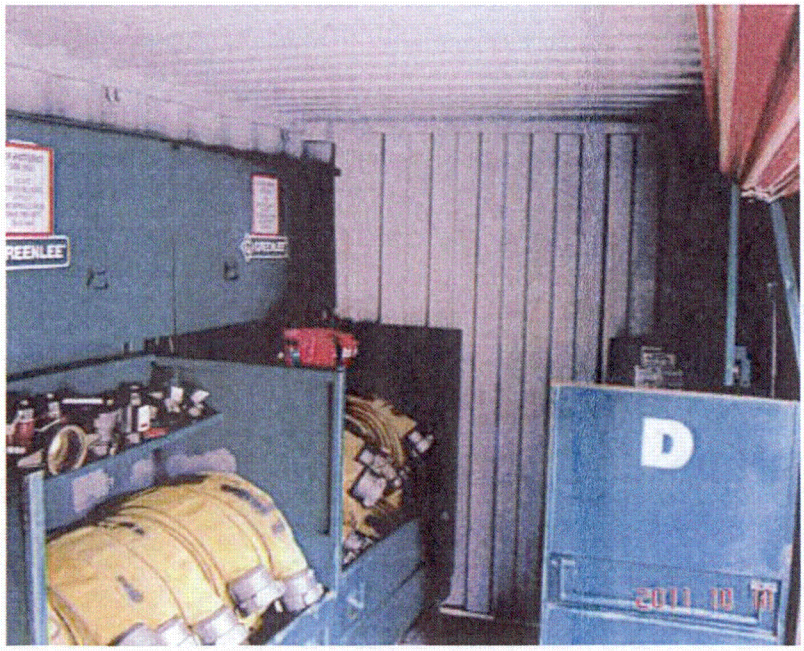
1500 KW Standby Generator



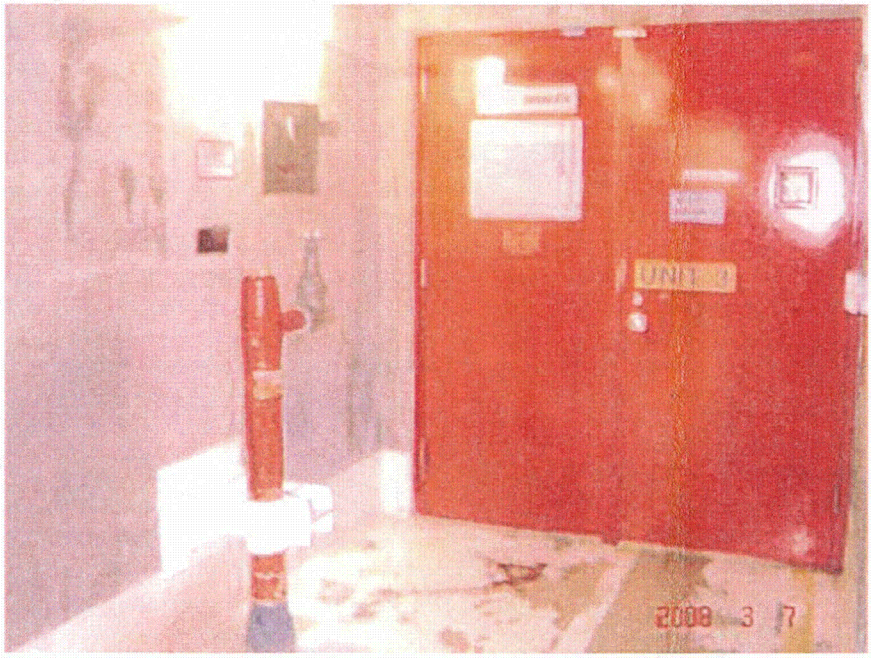
New Spray Headers above SFP



Spray Nozzle for alternate SFP Makeup



Equipment for SFP Alternate Makeup



Fire Riser just outside SFP (Elev 63'-6")

Fire Riser just inside of the door
(to the outside at Elev 37')

ATTACHMENT 2

MITIGATING STRATEGY EQUIPMENT TESTING AND PREVENTIVE MAINTENANCE

MITIGATING STRATEGY EQUIPMENT TESTING AND PREVENTIVE MAINTENANCE

Diesel Driven Firewater Pump SA2301 MP220

Description	Frequency	Procedure
Monthly Operability Verification Tests	31 days	SO23-3-36, Fire Suppression System
Annual Operability Verification Annual Tests	12 months	SO23-3-36.1, Fire Suppression System
Manufacture's Preventative Maintenance Firewater Pump	18 months	SO23-I-2.21, Surveillance Diesel Driven

Electric Driven Firewater Pumps SA2301 MP221 and 222

Description	Frequency	Procedure
Monthly Operability Verification	31 days	SO23-3-36
Annual Operability Verification	12 months	SO23-3-36.1
Flow path Verification	3 years	SO23-XIII-40

Firewater Storage Tanks SA2301 MT102/103

Description	Frequency	Procedure
Water Supply Verification	7 days	SO23-3-3.27.3
Internal/External Inspection	5 years	SONGS Maintenance Plan 30019492

Seismically Qualified Diesel Driven Pump SA2301 MP1065

Description	Frequency	Procedure
Monthly Operability Verification	31 days	SO23-XV-4.67
Annual Operability Verification	12 months	SO23-XV-4.67
Manufacture's Preventative Maintenance	18 months	SO23-XV-4.67

Gasoline Driven Skid Mounted Makeup Pump SA2301 MP1058

Description	Frequency	Procedure
Monthly Operability Verification	31 days	SO23-XIII-73
Annual Operability Verification	12 months	SO23-XIII-73t
Manufacture's Preventative Maintenance	12 months	SO23-XIII-73

Seismically Qualified Water Storage Tank SA1417 MT351

Description	Frequency	Procedure
Water Supply Verification	7 days	SO23-3-3.27.3

Demineralized Water Storage Tanks SA1417 MT266/267/268

Description	Frequency	Procedure
Water Supply Verification	7 days	SO23-3-3.27.3

Fire Hoses Credited for Mitigation Strategies Use

Description	Frequency	Procedure
Visual Verification	4 months	SO23-XIII-56
Hydrostatic Testing	12 months	SO23-XIII-44

Fire Hose Stations and Standpipes Credited for Mitigation Strategies Use

Description	Frequency	Procedure
Visual Verification	4 months	SO23-XIII-56, SO23-XIII-56
Standpipe Testing	12 months	SO23-XIII-56, SO23-XIII-56

ATTACHMENT 3

SPENT FUEL POOL LEVEL CORRELATION

SPENT FUEL POOL LEVEL CORRELATION CHART

SFP LEVEL REFERENCE	HEIGHT ABOVE FUEL IN RACKS	PLANT ELEVATION
SFP Overflow	28' 5 ½"	61' 5"
High Level Alarm Setpoint (Control Room Indicator Upper Limit)	28' 3" (CR Ind. 28' 2 9/16")	61' 2½"
Normal Low Alarm Setpoint	26' 6 ½"	59' 6"
Unit 3 SFP Cooling Discharge Siphon Break	26' 0 ½"	59' 0"
Unit 2 SFP Cooling Discharge Siphon Break	25' 11 ½"	58' 11"
Purification Low Suction Limit	23' 2 ½"	56' 2"
LCO Limit **[CTS]** 3.7.16 **[PDTS]** 3.1.1 >>>>	23' 0"	56'
Control Room Indication Lower Limit	22' 0"	55'
SFP Suction (piping center line)	21' 10 ½"	54' 10"
Bottom of Transfer Pool Refueling Gate	2' 5 ½"	35' 5"
Top of Fuel Assemblies	0' 0"	33'

ATTACHMENT 4

TABLE 1 OF Q-LIST

APPENDIX B APPLICABILITY TO AUGMENTED QUALITY SSCs

TABLE 1 - APPENDIX B APPLICABILITY TO AUGMENTED QUALITY SSCs

A	B	C	D	E	F
App B Criteria	**Description**	**Fire Protection**	**QCIII-AQ SFP Cooling & Makeup (1)**	**QCIII-AQ Radiation Monitors(2)**	**Nuclear Security(3)**
1	Organization	NA	NA	NA	NA
2	Quality Assurance Program	A*	A*	A*	A*
3	Design Control	A*	A*	A*	A*
4	Procurement Document Control	A*	A	A	A*
5	Instructions, Procedures, Drawings	A*	A	A	A
6	Document Control	A	A	A	A
7	Control of Purchased Material, Equipment, & Services	A*	A	A	A*
8	Identification and Control of Materials, Parts, and components	NA	NA	NA	NA
9	Control of Special Processes	NA	A	NA	NA
10	Inspection	A*	A	NA	NA
11	Test Control	A*	NA	NA	A
12	Control of M&TE	NA	A	A	A
13	Handling, Storage, & Shipping	NA	NA	NA	NA
14	Inspection, Test, and Operating Status	A*	NA	NA	A
15	Nonconforming Materials, Parts, or Components	A*	A	A	NA
16	Corrective Action	A*	A	A	A
17	Quality Assurance Records	A*	A	A	A
18	Audits	A	A	A	A

Key:

A = Applicable. The correlating chapter of the DQAP applies in its entirety.
NA = Not Applicable. The correlating chapter of the DQAP does not apply.
A* = Applicable with comments as delineated in Applicability Comments below.

Notes:

(1) SFP cooling refers to those QCIII-AQ SSCs that support SFP cooling, including CCW and SWC

(2) The specific monitors that are QCIII-AQ are listed in Note bb at the end of the Q-list.

(3) Nuclear Security SSCs include those SSCs described in Note (as) in the NOTES section of this document.

Applicability Comments:

NOTE: A letter followed by a number refers to the position in Table 1. For example, C3 refers to Fire Protection, App B Criterion 3, Design Control

Generic:

C2, D2, E2, F2 (QAP) QA Program requirements are limited as defined in this table.
C3, D3, E3, F3 (Design Control): Because in the decommissioned state the original design requirements may be overly cumbersome and no longer applicable, the following requirements of the DQAP Section 3 do NOT apply:

Where a test program is used to verify the adequacy of a specific design feature in lieu of other verifying or checking processes, it shall include suitable qualifications testing of a prototype unit under the most adverse design conditions.

These (design) changes shall be subject to design control measures commensurate with those applied to the original design.

Fire Protection:
C4, C5, C7, C10, C11, C14-C17 are applicable only to those areas where a fire hazard has the potential to adversely affect the function of important to safety SSCs.

Nuclear Security SSCs
F4, F7 Services provided by Vendors and Contractors are required to meet Regulatory requirements listed in 10 CFR 73.26, 10 CRF 73.54, 10 CFR 73.55(a) and (b), 10 CFR 73.56.

Classification

The Equipment Classification Table provides the quality classification of major plant structures, components, and systems. For Quality Class I and II items, the applicable requirements of 10CFR50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants, have been met to ensure the highest quality standards.

Those items designed as Quality Classes I, II, III and IV make up the Project Q-List used in development, review, approval and control of the design of major plant structures, components, and systems. Quality classification information to a finer level of detail than that provided in the Q-List may be found in approved design documents. Such approved design documents include, but are not limited to, drawings (i.e., piping and instrument diagrams, electrical elementaries, one-line diagrams, etc.), specifications, engineering evaluations, validated data bases (i.e., mechanical consolidated database, consolidated controls database instrument index, electrical consolidated database (including environmental qualification master list), piping material classification, etc.) or as established within a Component Classification Evaluation Document (CCED) or Technical Evaluation (TE).

The Quality Class of SSCs is shown in a large number of documents and computer applications at SONGS. In the permanently defueled condition, it is neither practical nor necessary to change all of these documents. In cases of conflict, 90034 (Q-List) is the defining document.