

August 16, 2018

10 CFR 50.54(a)

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

**SUBJECT: Docket Nos. 50-206, 50-361, 50-362 and 72-041
Response to a Request for Additional Information Regarding
Proposed Revision to the Southern California Edison (SCE) San
Onofre Nuclear Generating Station Decommissioning Quality
Assurance Program (DQAP), San Onofre Nuclear Generating Station
(SONGS), Units 1, 2, 3, and ISFSI**

- REFERENCES:**
1. Letter from T. J. Palmisano (SCE) to Document Control Desk (NRC) T. J. Palmisano (SCE), dated May 1, 2018, Subject: Docket Nos. 50-206, 50-361, 50-362 and 72-041, Proposed Revision to the Southern California Edison (SCE) San Onofre Nuclear Generating Station Decommissioning Quality Assurance Program (DQAP), San Onofre Nuclear Generating Station (SONGS), Units 1, 2, 3, and ISFSI, (ADAMS Accession No. ML18124A055)
 2. Letter from Document Control Desk (NRC) to T. J. Palmisano dated July 19, 2018; Subject; San Onofre Nuclear Generating Station, Units 1, 2 And 3 – Request For Additional Information Regarding Revision 6 Of The Decommissioning Quality Assurance Program (ADAMS Accession No. ML18193A200)

Dear Sir or Madam

The purpose of this letter is to respond to a request for additional information regarding a change to the San Onofre Nuclear Generating Station (SONGS) Decommissioning Quality Assurance Program (DQAP). Southern California Edison (SCE) submitted a proposed change for NRC review to the DQAP in accordance with 10 CFR 50.54(a) on May 1, 2018 (Reference 1). By letter dated July 19, 2018 (Reference 2) the NRC requested additional information to support their review of Reference 1. The Enclosure to this letter provides the response to the NRC's request.

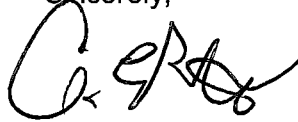
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There are no new regulatory commitments in this letter or the attachments.

If you have any questions or require additional information, please contact Mr. Albert Bates, at (949) 368-6945.

Executed on 8/16/12

Sincerely,

A handwritten signature in black ink, appearing to be 'Albert Bates', written in a cursive style.

Enclosure: Response to a Request for Additional Information regarding SONGS DQAP
Revision 6

cc: K. Kennedy, Regional Administrator, NRC Region IV
M. Vaaler, NRC Project Manager, SONGS Units 1, 2 and 3
S. Y. Hsu, California Department of Public Health, Radiologic Health Branch

ENCLOSURE

Response to a Request for Additional Information regarding SONGS DQAP Revision 6

SONGS Response to NRC Request for Additional Information

NRC RAI:

By letter dated May 1, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18124A055), Southern California Edison (SCE)) submitted an application seeking U.S. Nuclear Regulatory Commission (NRC) review and approval of Revision 6 of the Decommissioning Quality Assurance Program (DQAP) for the San Onofre Nuclear Generating Station (SONGS), Units 1, 2, and 3, respectively, and the Independent Spent Fuel Storage Installation (ISFSI). The proposed changes to the DQAP, which are considered to be reductions in commitments, have been submitted for NRC review and approval in accordance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) paragraph 50.54(a)(4).

The proposed DQAP reflects the transition of the decommissioning status at SONGS that will follow completion of the transfer of all spent nuclear fuel from the spent fuel pools to dry fuel storage in the ISFSI, and represents a reduction in commitments from the previously approved SONGS DQAP. Subsequent to this transition, there will be no structures, systems, or components (SSCs), items or activities classified as safety-related as defined in Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities." In addition, the highest level of safety significance for the remaining items and activities at the facility is designated as important-to-safety under 10 CFR Part 71, "Packaging and Transportation of Radioactive Material," and 10 CFR Part 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater than Class C Waste." The following additional information is necessary to complete the NRC staff's technical review.

SONGS-RAI-1

The requirements of Criterion VII, "Control of Purchased material, Equipment, and Services," of Appendix B to 10 CFR Part 50 states, in part, that "Measures shall be established to assure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents."

Appendix C, "Regulatory Requirements and Commitments," of the SONGS DQAP includes two alternatives for the procurement of commercial calibration and testing services as part of the commercial-grade dedication process.

Clarify if the applicable controls and conditions from the NRC Safety Evaluation (SE) approving the Arizona Public Service (APS) request for changes to the quality assurance program at the Palo Verde Nuclear Generating Station, Units 1, 2, and 3, dated September 28, 2005 (ADAMS Accession No. ML052710224), as well as the NRC SE endorsing the guidelines contained in the Nuclear Energy Institute's (NEI) 14-05, "Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," dated February 9, 2015 (ADAMS Accession No. ML14322A535), are described in the applicable implementing procedures at SONGS.

In addition, given that NRC's endorsement of NEI 14-05 expands the acceptance of the International Laboratory Accreditation Cooperation accreditation process documented in the

APS SE, please clarify your intent to use this process by committing to both of the alternatives.

SCE Response:

In support of the transition to this revision to the DQAP, approved procedures are required to be provided for implementing activities subject to the DQAP. Specifically, Section 5.0 of the proposed DQAP requires that *measures are established to assure that quality activities are prescribed by and performed in accordance with documented instructions, procedures, or drawings*. This requirement will ensure that sufficient guidance is provided within administrative controls and that individuals involved with the implementation of these activities will be trained and qualified. Alternatives provided within the DQAP require specific guidance to be provided within approved implementing procedures on their use and limitations. To address the final comment within this RAI, SCE proposes to eliminate the first Alternative related to the Palo Verde Nuclear Generation Station SER from the administrative controls of the proposed DQAP. The following is the modified section of the proposed DQAP:

Alternatives

1. Suppliers providing commercial grade calibration and testing services, who are accredited by a nationally recognized accrediting body, as described in Nuclear Energy Institute (NEI) 14-05 guidelines, may be used without additional qualification, provided the conditions of the associated NRC Safety Evaluation are met. Controls shall be established in applicable procedures to ensure the requirements of the NRC Safety Evaluation are satisfied prior to acceptance.

SONGS-RAI-2

The requirements of Criterion II, "Quality Assurance Program," of Appendix B to 10 CFR Part 50, states, in part, that "The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

Section 3.0, "Facility Staff Qualifications," in Appendix D, "Administrative Controls," of the SONGS DQAP limits the applicability of the American National Standards Institute (ANSI) N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," to spent fuel safety and radiation protection personnel, including those individuals that will be performing the final status survey activities.

Explain why the training requirements described in the SONGS DQAP do not reflect all of the site personnel and are limited to personnel only involved in performing spent fuel safety, radiation protection, and final status survey activities.

SCE Response:

As described within Section 2.0 of the DQAP, training and qualifications are required for those assigned activities which are subject to the scope of the DQAP. This section of the DQAP specifically states the following:

Personnel Training and Qualifications

Individual managers are responsible for ensuring that personnel working under their cognizance are provided with the necessary indoctrination training and resources to accomplish assigned activities which fall under the scope of the DQAP.

Members of the SONGS staff (including audit and inspection personnel) shall have the appropriate qualifications necessary to perform their assigned duties defined in implementing procedures. These implementing procedures provide the criteria utilized for determining and assessing appropriate staff qualification. Additionally, Appendix D cites references that stipulate the use of specific industry standards addressing qualifications. Training programs are established and implemented to ensure that personnel achieve and maintain suitable proficiency. Personnel training and qualification records are maintained in accordance with approved procedures.

The reference provided to Appendix D supplements the need for training and qualifications subject to the activities that fall under the scope of the DQAP. The ANSI N18.1 Standard scope is specifically provided to support the operation of a Nuclear Power Plant. With all spent nuclear fuel transferred to the ISFSI, the concept of spent nuclear fuel safety will principally involve operation and maintenance of the ISFSI. Additional ongoing and future activities that fall within the scope of the proposed DQAP will be performed by facility staff subject to the personnel training and qualifications requirements within DQAP Section 2, *Quality Assurance Program*. Examples of specific training and qualification requirements that continue to apply to the non-ISFSI portion of the facility include important to safety (ITS) activities subject to the DQAP, such as packaging of greater than class C (GTCC) waste and activities related to 10CFR71 Type B Packages. Radiation Protection personnel will continue to use the ANSI N18.1 industry standard for training and qualifications as those personnel are subject to providing support to ISFSI activities related to the safe storage of spent nuclear fuel.

Training of site personnel applicable to DQAP section 2.0 and/or Appendix D requirements, will be task based and defined within site procedures which will continue to apply through the completion of decommissioning.

Based on this RAI, SCE proposes to revise the language contained within Section 3.0, "Facility Staff Qualifications," in Appendix D, "Administrative Controls," of the proposed SONGS DQAP. The following is the proposed modified section:

3.0 Facility Staff Qualifications

3.1 Facility staff responsible for the safe storage of nuclear fuel and selected decommissioning activities shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions as defined in approved procedures except for: a) the radiation protection manager who shall meet or exceed the qualifications of Regulatory guide 1.8, September 1975.