

Predecisional Enforcement Conference with Southern California Edison

January 24, 2019

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- In the event of technical difficulties with the webinar, a telephone bridge line will be used:
 - Bridge Number: (888) 942-9646
 - Passcode: 9856491
 - Link to NRC Spotlight:
<https://www.nrc.gov/reactors/operating/ops-experience/songs-spec-insp-activities-cask-loading-misalignment.html>

Agenda

| Topic | Participants |
|-----------------------------------|-----------------------------|
| Opening Remarks and Introductions | Scott Morris |
| Conference Process | Linda Howell |
| Licensee Opening Remarks | Southern California Edison |
| Enforcement Policy and Process | Michael Vasquez |
| Summary of Apparent Violations | Dr. Janine Katanic |
| Licensee Presentation | Southern California Edison |
| Questions and Discussion | All Conference Participants |
| NRC Caucus | NRC Participants |
| Questions and Discussions | All Conference Participants |
| Closing Remarks | Scott Morris |

FOR TODAY'S MEETING

- No Final Decision Will Be Made
- We Want Southern California Edison's Perspectives
 - Whether violations occurred
 - Significance of the violations
 - Corrective Actions

SIGNIFICANCE = “Severity Level”

SEVERITY LEVEL – I

(most significant regulatory concern)

SEVERITY LEVEL – II

(very significant regulatory concern)

SEVERITY LEVEL – III

(significant regulatory concern)



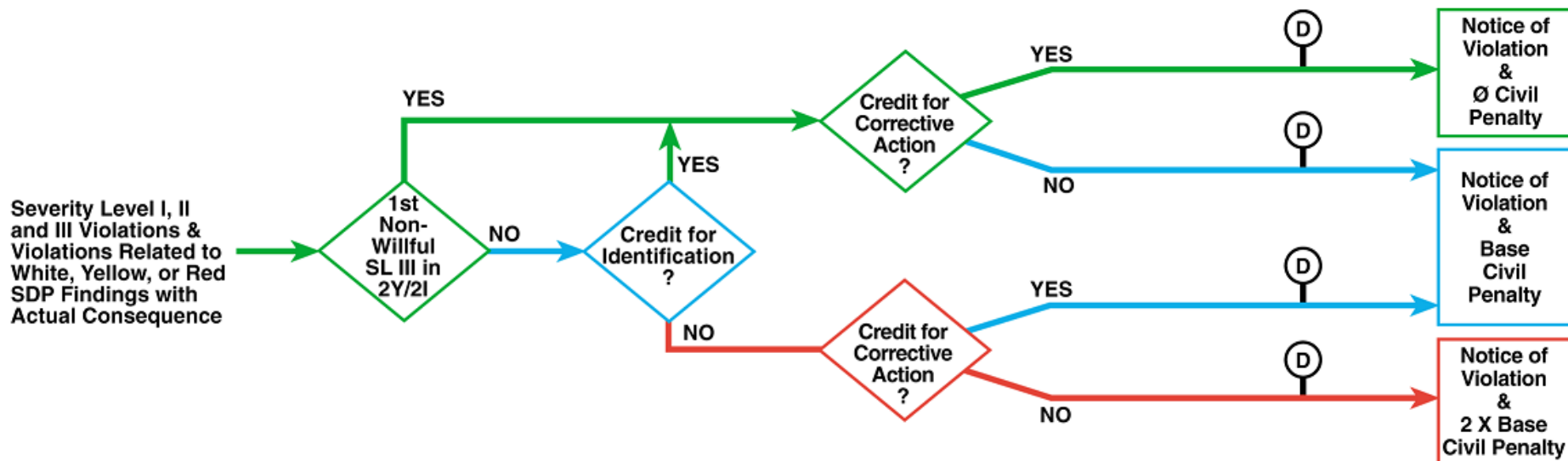
(Escalated Enforcement)

(Non-Escalated Enforcement)

SEVERITY LEVEL – IV

(less significant concern, but more than minor)

CIVIL PENALTY: WHEN & HOW MUCH?



POSSIBLE OUTCOMES

- No Action
- Notice of Violation (NOV)
- NOV with Civil Penalty (\$)
- Order

APPEAL RIGHTS

- Any NRC action may be challenged
- Civil Penalties and Orders provide hearing rights

Questions regarding NRC's Enforcement Process?

Apparent Violation No. 1

10 CFR 72.212(b)(3) requires, in part, that each cask used by the general licensee conforms to the terms, conditions, and specifications of a Certificate of Compliance. Certificate of Compliance 072-01040, Amendment 2, requires that lifting operations must be in accordance with Technical Specification, Appendix A, Section 5.2.c.3, which requires that the canister be lifted and carried with redundant drop protection features to prevent uncontrolled lowering of the load.

THESE APPARENT VIOLATIONS ARE SUBJECT TO FURTHER REVIEW AND MAY BE REVISED

Apparent Violation No. 2

10 CFR 72.75(d)(1) requires, in part, that each licensee notify the NRC within 24 hours after the discovery of events involving spent fuel in which important to safety equipment is disabled or fails to function as designed when the equipment is required by certification of compliance to be available and operable to mitigate the consequences of an accident and no redundant equipment was available and operable to perform the required safety function.

THESE APPARENT VIOLATIONS ARE SUBJECT TO FURTHER REVIEW AND MAY BE REVISED

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CAUCUS IN SESSION
RETURN SHORTLY

NRC Next Steps

- Final NRC determination of apparent violations
- Follow-up Inspections
 - Independent assessment of licensee performance
 - Determine effectiveness of corrective actions

Feedback, Questions, and Comments

Post Conference Feedback Link:

<https://www.nrc.gov/public-involve/public-meetings.html>

CONCLUSION OF PEC

Questions and Comments

Present in Conference Room:

- Raise your hand to get the facilitator's attention. Please state your name and affiliation clearly into the microphone before posing your question or comment.

On the Webinar:

- Type your name, affiliation, and your question into the webinar QUESTION box. The facilitator will pose a summary of the questions to the NRC panel.