

**RESPONSE TO FREEDOM OF
INFORMATION ACT (FOIA) REQUEST**

2019-000034

2

RESPONSE
TYPE☐

INTERIM

☒

FINAL

REQUESTER:

Charles Langley

DATE:

08/09/2019

DESCRIPTION OF REQUESTED RECORDS:

All records involving the San Onofre Nuclear Generating Station (SONGS), Independent Spent Fuel Storage Installation (ISFSI), since January 30, 2018

PART I. -- INFORMATION RELEASED

- ☐ The NRC has made some, or all, of the requested records publicly available through one or more of the following means: (1) <https://www.nrc.gov>; (2) public ADAMS, <https://www.nrc.gov/reading-rm/adams.html>; (3) microfiche available in the NRC Public Document Room; or FOIA Online, <https://foiaonline.gov/foiaonline/action/public/home>.
- ☒ Agency records subject to the request are enclosed.
- ☐ Records subject to the request that contain information originated by or of interest to another Federal agency have been referred to that agency (See Part I.D -- Comments) for a disclosure determination and direct response to you.
- ☐ We are continuing to process your request.
- ☒ See Part I.D -- Comments.

PART I.A -- FEES

AMOUNT

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You will be billed by NRC for the amount indicated.

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You will receive a refund for the amount indicated.

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Fees waived.

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Since the minimum fee threshold was not met, you will not be charged fees.

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Due to our delayed response, you will not be charged search and/or duplication fees that would otherwise be applicable to your request.

PART I.B -- INFORMATION NOT LOCATED OR WITHHELD FROM DISCLOSURE

- ☐ We did not locate any agency records responsive to your request. *Note:* Agencies may treat three discrete categories of law enforcement and national security records as not subject to the FOIA ("exclusions"). See 5 U.S.C. 552(c). This is a standard notification given to all requesters; it should not be taken to mean that any excluded records do, or do not, exist.
- ☒ We have withheld certain information pursuant to the FOIA exemptions described, and for the reasons stated, in Part II.
- ☐ Because this is an interim response to your request, you may not appeal at this time. We will notify you of your right to appeal any of the responses we have issued in response to your request when we issue our final determination.
- ☒ You may appeal this final determination within 90 calendar days of the date of this response. If you submit an appeal by mail, address it to the FOIA Officer, at U.S. Nuclear Regulatory Commission, Mail Stop T-6 A60M, Washington, D.C. 20555-0001. You may submit an appeal by e-mail to FOIA.resource@nrc.gov. You may fax an appeal to (301) 415-5130. Please be sure to include on your submission that it is a "FOIA Appeal." Only a pre-registered user may file an appeal through FOIA Online, <https://foiaonline.gov/foiaonline/action/public/home>. A user who has not registered an account prior to filing the initial FOIA request may still submit their appeal by one of the above mentioned options.

PART I.C -- REFERENCES AND POINTS OF CONTACT

You have the right to seek assistance from the NRC's FOIA Public Liaison by submitting your inquiry at <https://www.nrc.gov/reading-rm/foia/contact-foia.html>, or by calling the FOIA Public Liaison at (301) 415-1276.

If we have denied your request, you have the right to seek dispute resolution services from the NRC's Public Liaison or the Office of Government Information Services (OGIS). To seek dispute resolution services from OGIS, you may e-mail OGIS at ogis@nara.gov, send a fax to (202) 741-5789, or send a letter to: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road, College Park, MD 20740-6001. For additional information about OGIS, please visit the OGIS website at <https://www.archives.gov/ogis>.



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PART I.D -- COMMENTS

This is the final response. The following documents consist of information that the NRC determined, after conferring with Southern California Edison, Holtec, and NRC staff, as proprietary to Holtec. Accordingly, these documents are being withheld in their entirety under FOIA exemption 4:

1. Apparent Cause Evaluation (ACE), Rev. 0
2. Root cause Analysis Report
3. Holtec Dry Storage Position Paper DS-470
4. Southern California Edison (SCE) Actin Request Detail Reports
5. Holtec Report, HI-2188261, Structural Evaluation of the MPC Handling Event At SONGS
6. Holtec HSP-57, Cavity Enclosure Container (CEC) Site Receiving
7. Holtec Proprietary Drawings
8. Holtec Dry Cask Lessons Learned/Best Practices Database
9. Holtec HPP-2464-005, Cranes and Riggings Program, Rev. 1
10. Holtec HPP-2464-006, Periodic Inspection and Testing of Rigging and Accessories, Rev. 2
11. Holtec HPP-2464-008, Rigging Manual, Rev. 6
12. Holtec HPP-2464-009, Maintenance and Inspection of Cranes, Rev. 4
13. Holtec HPP-2464-600, Responding to Abnormal Conditions, Rev. 6
14. Holtec Procedure Field Change Notice, PFCN-HPP-2464-400-R15-001/002
15. Holtec HPP-2464-400, MPC Transfer at SONGS, Rev. 15
16. Holtec HPP-2464-82, SONGS ISFSI Work Plan Preparation Procedures
17. Holtec HPP-2464-400, MPC Transfer at SONGS, Rev. 16
18. Holtec Licensing Drawing package I.D. 8446
19. Holtec HSP-34, Training of Subcontracted Field Service Personnel, Rev. 14
20. Holtec Training Lesson Plan, LP-HOL-07
21. Holtec Cask Loading Supervisor Training Presentation
22. Holtec HSP-1157, Cask Loading Supervisors Oral Boards, Rev. 0
23. Holtec HPP-2464-007, NUREG 0612 Cranes, Rigging and Lifting Controls, Rev. 6
24. Holtec Report HI-2002572, Evaluation of the Confinement Integrity of a Loaded Holtec MPC Under A Postulated Drop Event
25. Holtec PS-1234, Purchase Specification for The MPC Downloading Sling For Downloading Using the VCT, Rev. 4
26. SONGS Fuel Transfer Operations Pre-Job Briefs
27. Holtec MPC Transfer for a HI-Storm UMAX System presentation
28. Holtec Load Handling Controls for Crane and VCT Operations presentation
29. Holtec OJT-HOL-007, OJT/TPE Qualification Guide for Tracked VCT (LSI/J&R) Operations, Rev. 1
30. Holtec OJT-HOL-001, OJT/TPE Qualification Guide for Mating Device Operations
31. Holtec OJT-HOL-002, OJT/TPE Qualification Guide for Lift Yoke Operations
32. Holtec OJT-HOL-003, OJT/TPE Qualification Guide for RVOA Operations
33. Holtec Training Lesson Plan, LP-HOL-06
34. Holtec OJT-HOL-007, OJT/TPE Qualification Guide For J&R Tracked VCT Operations, Rev. 0
35. Holtec Training Lesson Plan, LP-HOL-UMAX-001
36. Holtec Training Lesson Plan, LP-HOL-UMAX-002

(continued on next page)

Signature - Freedom of Information Act Officer or Designee

Stephanie A. Blaney

Digitally signed by Stephanie A. Blaney

Date: 2019.08.09 07:01:48 -04'00'



**RESPONSE TO FREEDOM OF INFORMATION
ACT (FOIA) REQUEST (Continued)**

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PART I.D -- COMMENTS

(cont'd)

37. Holtec Training Lesson Plan, LP-HOL-UMAX-003
38. Holtec Training Lesson Plan, LP-HOL-04
39. Holtec Certificate of Compliance Technical Specifications
40. Holtec OJT-HOL-012, OJT/TPE Qualification Guide for HI-Port (Goldhofer), Rev. 0
41. Holtec Dry Cask Storage Training Records
42. Holtec Event Response Plan, Stand Down, FCR-2464-1062
43. Holtec Event Response Plan, Stop Work Order, FCR-2464-LOA-106
44. Holtec OJT-HOL-007, OJT/TPE Qualification Guide for Tracked VCT (LSI/J&R) Operations
45. Holtec HPP-2464-720, Inspection and Maintenance for Vertical Cask Transporter (VCT, Rev. 2)
46. Holtec HPP-2462-400, Attachment 8.8: VCT Frequent Use Inspection Checklist, Rev. 15
47. ISFSI-Fuel-564-089, ANSI Inspection and Recertification for Special Lifting Devices Documentation
48. Holtec HSP-355, Periodic Inspection and Recertification of Special Lifting Devices, Rev. 7
49. Holtec HSP-1104, Visual Weld Examination, Rev. 2
50. Holtec HSP-1105, Liquid Penetrant Examination, Rev. 3
51. Holtec HSP-347, Preparation and Painting of Ancillaries, Rev. 2
52. MPC FW Lift Cleat Load Test Record, HSP-710
53. Holtec HSP-355, Exhibit 7.11: Special Lifting Device Quarterly Visual Inspection, Rev. 10
54. Holtec HSP-355, Exhibit 7.14: Special Lifting Device Quarterly Visual Inspection, Rev. 11
55. Holtec HSP-355, Exhibit 7.14: Special Lifting Device Quarterly Visual Inspection, Rev. 9
56. Holtec Training Lesson Plan, LP-HOL-006
57. Holtec Job Hazard Analysis, SONGS Spent Fuel Pool Work Area
58. Holtec pool to Pad Project Radiation Protection Work Control Plan, Rev. 7
59. Holtec's Statement on Loading Handling and Additional Actions Taken at San Onofre Nuclear Generating Station
60. Summary of the Root Cause and Apparent Cause Evaluations of August 2018 Download Event at SONGS
61. Holtec Pool to Pad Project Radiation Protection Work Control Plan, Rev. 8
62. Design Change and Related Processes, Generic Fundamentals and Typical Site Expectations
63. SCE/Holtec Interface Protocol, July 11, 2018
64. Radiation Work Permit Summaries (18-2-519, 18-2-520, 18-2-521)
65. Holtec SONGS Project Organization Chart



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**RESPONSE TO FREEDOM OF
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Records subject to the request are being withheld in their entirety or in part under the FOIA exemption(s) as indicated below (5 U.S.C. 552(b)).

- ☐ Exemption 1: The withheld information is properly classified pursuant to an Executive Order protecting national security information.
- ☐ Exemption 2: The withheld information relates solely to the internal personnel rules and practices of NRC.
- ☐ Exemption 3: The withheld information is specifically exempted from public disclosure by the statute indicated.
- ☐ Sections 141-145 of the Atomic Energy Act, which prohibits the disclosure of Restricted Data or Formerly Restricted Data (42 U.S.C. 2161-2165).
- ☐ Section 147 of the Atomic Energy Act, which prohibits the disclosure of Unclassified Safeguards Information (42 U.S.C. 2167).
- ☐ 41 U.S.C. 4702(b), which prohibits the disclosure of contractor proposals, except when incorporated into the contract between the agency and the
- ☐ Other:
- ☒ Exemption 4: The withheld information is a trade secret or confidential commercial or financial information that is being withheld for the reason(s) indicated.
- ☐ The information is considered to be proprietary because it concerns a licensee's or applicant's physical protection or material control and accounting program for special nuclear material pursuant to 10 CFR 2.390(d)(1).
- ☒ The information is considered to be another type of confidential business (proprietary) information.
- ☐ The information was submitted by a foreign source and received in confidence pursuant to 10 CFR 2.390(d)(2).
- ☐ Exemption 5: The withheld information consists of interagency or intraagency records that are normally privileged in civil litigation.
- ☐ Deliberative process privilege.
- ☐ Attorney work product privilege.
- ☐ Attorney-client privilege.
- ☐ Exemption 6: The withheld information from a personnel, medical, or similar file, is exempted from public disclosure because its disclosure would result in a clearly unwarranted invasion of personal privacy.
- ☒ Exemption 7: The withheld information consists of records compiled for law enforcement purposes and is being withheld for the reason(s) indicated.
- ☐ (A) Disclosure could reasonably be expected to interfere with an open enforcement proceeding.
- ☒ (C) Disclosure could reasonably be expected to constitute an unwarranted invasion of personal privacy.
- ☐ (D) The information consists of names and other information the disclosure of which could reasonably be expected to reveal identities of confidential sources.
- ☐ (E) Disclosure would reveal techniques and procedures for law enforcement investigations or prosecutions, or guidelines that could reasonably be expected to risk circumvention of the law.
- ☐ (F) Disclosure could reasonably be expected to endanger the life or physical safety of any individual.
- ☐ Other:

PART II.B -- DENYING OFFICIALS

In accordance with 10 CFR 9.25(g) and 9.25(h) of the U.S. Nuclear Regulatory Commission regulations, the official(s) listed below have made the determination to withhold certain information responsive to your request.

DENYING OFFICIAL	TITLE/OFFICE	RECORDS DENIED	APPELLATE OFFICIAL	
			EDO	SECY
Stephanie Blaney	FOIA Officer	PII & Proprietary Information	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Select Title/Office from drop-down list		<input type="checkbox"/>	<input type="checkbox"/>
	Select Title/Office from drop-down list		<input type="checkbox"/>	<input type="checkbox"/>
	Select Title/Office from drop-down list		<input type="checkbox"/>	<input type="checkbox"/>