

November 7, 2019

PG&E Letter HIL-19-011

10 CFR 72.70

10 CFR 72.48

ATTN: Document Control Desk
Director, Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Materials License No. SNM-2514, Docket No. 72-27
Humboldt Bay Independent Spent Fuel Storage Installation
Final Safety Analysis Report Update, Revision 9 and Changes to Technical
Specification Bases and 10 CFR 72.48 Report of Changes, Tests, and Experiments
for the Period of October 2, 2017, through October 1, 2019

Dear Commissioners and Staff:

Pursuant to 10 CFR 72.70(c), and in accordance with 10 CFR 72.4, Pacific Gas and Electric Company (PG&E) hereby submits the Humboldt Bay (HB) Independent Spent Fuel Storage Installation (ISFSI) Final Safety Analysis Report (FSAR) Update, Revision 9. This revision includes changes to the FSAR Update since the last submittal through October 1, 2019, in accordance with 10 CFR 72.70 (c)(5). These changes were made under the provisions of 10 CFR 72.48. The approach to tracking revisions to the ISFSI FSAR Update has changed. The current revision number reflects a new numbering scheme to align the FSAR Update revision number with the submitted revision cycle. No revisions to the HB ISFSI FSAR Update required a 10 CFR 72.48 evaluation. There were no FSAR changes incorporated into this revision as a result of a license amendment.

The HB ISFSI FSAR Update, Revision 9, is enclosed, and is provided on one compact disk (CD-ROM) labeled "Humboldt Bay Independent Spent Fuel Storage Installation Final Safety Analysis Report Update, Revision 9, November 2019." The contents are in Adobe Acrobat Portable Document Format (pdf).

The CD-ROM contains the following files for HB ISFSI FSAR Update, Revision 9:

| <u>Filename</u> | <u>File Size</u> |
|---|------------------|
| 001 HB ISFSI FSAR R9 Except 2.6 Figs.pdf | 25.4 MB |
| 002 HB ISFSI FSAR R9 Figs 2.6-1 to 2.6-20.pdf | 39.7 MB |
| 003 HB ISFSI FSAR R9 Figs 2.6-21 to 2.6-44.pdf | 30.0 MB |
| 004 HB ISFSI FSAR R9 Figs 2.6-45 to 2.6-46.pdf | 45.8 MB |
| 005 HB ISFSI FSAR R9 Figs 2.6-47 to 2.6-85.pdf | 46.9 MB |
| 006 HB ISFSI FSAR R9 Figs 2.6-86 to 2.6-120.pdf | 44.2 MB |

IE47
NM5526
NM5520
NM55



Pursuant to the requirements of 10 CFR 72.48(d)(2) and in accordance with 10 CFR 72.4, PG&E is required to submit a report of changes, tests, and experiments since the last submittal through October 1, 2019. There were no changes, tests, or experiments that required an evaluation during the reporting period.

Additionally, HB ISFSI Technical Specification 5.1.1, "Technical Specifications (TS) Bases Control Program," requires that changes made to the TS Bases without prior NRC approval be provided to the NRC on a frequency consistent with 10 CFR 72.48(d)(2). During this reporting period, PG&E did not implement any changes to the HB ISFSI TS Bases.

PG&E makes no new or revised regulatory commitments (as defined by NEI 99-04) as part of this submittal.

If you have any questions regarding this submittal, please contact Mr. Hossein Hamzehee at 805-545-4720.

This certifies, to the best of my judgement and belief, that Revision 9 accurately presents changes made since the previous submittal.

Sincerely,



Maureen Zuwalick for J. Welsch

James M. Welsch
Senior Vice President Generation and Chief Nuclear Officer

Enclosure

cc: Scott A. Morris, NRC Region IV Administrator
HBPP Humboldt Distribution
cc/enc: William C. Allen, NRC Project Manager