



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

December 9, 2019

Mr. Doug Bauder
Vice President and Chief Nuclear Officer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

**SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION – NRC INSPECTION
REPORT 05000361/2019-006 AND 05000362/2019-006**

Dear Mr. Bauder:

This letter refers to the U.S. Nuclear Regulatory Commission's (NRC's) inspection conducted on November 18-21, 2019, at the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. The NRC inspector discussed the results of this inspection with members of your staff during a final onsite exit meeting conducted on November 21, 2019. The inspection results are documented in the enclosure to this letter.

This inspection examined activities conducted under your license as they relate to public health and safety, the common defense and security, and to confirm compliance with the Commission's rules and regulations, and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of site meetings, performance of independent radiation measurements, and interviews with personnel. Specifically, the inspector reviewed decommissioning planning activities for SONGS Units 2 and 3, implementation of the fire protection program, controls for spent fuel pool safety, and the implementation of the adverse weather protection program. Within the scope of the inspection, no violations were identified and a response to this letter is not required.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC's Website at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the Public without redaction.

D. Bauder

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If you have any questions regarding this inspection report, please contact Stephanie Anderson at 817-200-1213, or the undersigned at 817-200-1249.

Sincerely,

/RA/

Gregory G. Warnick, Chief
Reactor Inspection Branch
Division of Nuclear Materials Safety

Docket Nos.: 50-361; 50-362
License Nos.: NPF-10; NPF-15

Enclosure:
Inspection Report 05000361/2019-006;
05000362/2019-006
w/Attachment: Supplemental Information

U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket Nos.: 05000361; 05000362
License Nos.: NPF-10; NPF-15
Report Nos.: 05000361/2019-006; 05000362/2019-006
Licensee: Southern California Edison Company
Facility: San Onofre Nuclear Generating Station, Units 2 and 3
Location: 5000 South Pacific Coast Highway, San Clemente, California
Inspection Dates: November 18-21, 2019
Inspector: Stephanie G. Anderson, Health Physicist
Reactor Inspection Branch
Division of Nuclear Materials Safety
Accompanied By: Amy Snyder, Senior Project Manager
Reactor Decommissioning Branch
Office of Nuclear Materials Safety and Safeguards
Approved By: Gregory G. Warnick, Chief
Reactor Inspection Branch
Division of Nuclear Materials Safety

Enclosure

EXECUTIVE SUMMARY

San Onofre Nuclear Generating Station, Units 2 and 3
NRC Inspection Report 05000361/2019-006; 05000362/2019-006

This U.S. Nuclear Regulatory Commission (NRC) inspection was a routine, announced inspection of decommissioning activities being conducted at the San Onofre Nuclear Generating Station, Units 2 and 3. In summary, the licensee was conducting these activities in accordance with site procedures, license requirements, and applicable NRC regulations. Within the scope of the inspection, no violations were identified.

Decommissioning Performance and Status Review at Permanently Shutdown Reactors

- The licensee continued to conduct decommissioning in accordance with the general guidance provided in the Post-Shutdown Decommissioning Activities Report. The licensee implemented an oversight program to ensure that contractors conducted decommissioning work activities in accordance with procedural requirements as well as licensee expectations. The licensee implemented operational, radiological, fire protection, and housekeeping programs to ensure safe storage of spent fuel. (Section 1.2)

Spent Fuel Pool Safety at Permanently Shutdown Reactors

- The San Onofre Nuclear Generating Station Units 2 and 3 spent fuel pools were being maintained in accordance with technical specifications and procedural requirements. The licensee was safely storing spent fuel in wet storage. (Section 2.2)

Adverse Weather Protection

- The licensee had initiated its adverse weather preparations in accordance with the applicable regulatory and license requirements. (Section 3.2)

Report Details

Summary of Plant Status

On June 12, 2013, the Southern California Edison Company (SCE), the licensee, formally notified the NRC by letter that it had permanently ceased power operations at the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, effective June 7, 2013. The licensee's letter is available in the Agencywide Documents Access and Management System (ADAMS) under (ADAMS Accession No. ML131640201). By letters dated June 28, 2013 (ADAMS Accession No. ML13183A391), and July 22, 2013 (ADAMS Accession No. ML13204A304), the licensee informed the NRC that the reactor fuel had been permanently removed from SONGS, Units 3 and 2, reactor vessels as of October 5, 2012, and July 18, 2013, respectively.

Upon docketing of these certifications, and pursuant to Title 10 of the *Code of Federal Regulations* (CFR) 50.82(a)(2), the SONGS, Units 2 and 3, facility operating licenses no longer authorized operation of the reactors or emplacement or retention of fuel into the reactor vessels. In response to the licensee's amendment request, the NRC issued the permanently defueled technical specifications on July 17, 2015 (ADAMS Accession No. ML15139A390), along with revised facility operating licenses to reflect the permanent cessation of operations at SONGS, Units 2 and 3.

The licensee submitted its Post-Shutdown Decommissioning Activities Report (PSDAR) on September 23, 2014 (ADAMS Accession No. ML14269A033), which is required to be submitted within 2 years following permanent cessation of operations under 10 CFR 50.82(a)(4). The PSDAR outlines the decommissioning activities for SONGS, Units 2 and 3. By letter dated August 20, 2015 (ADAMS Accession No. ML15204A383), the NRC informed the licensee that the PSDAR contained the information required by 10 CFR 50.82(a)(4)(i). In the current plant configuration, the number of operable systems and credible accidents/transients is significantly less than for a plant authorized to operate the reactor or emplace or retain fuel in the reactor vessel.

On March 11, 2016, the NRC issued two revised facility operating licenses for SONGS, Units 2 and 3 (ADAMS Accession No. ML16055A522), in response to the licensee's amendment request dated August 20, 2015 (ADAMS Accession No. ML15236A018). The license amendment allowed the licensee to revise its Updated Final Safety Analysis Report (UFSAR) to reflect the significant reduction of decay heat loads in the SONGS, Units 2 and 3, spent fuel pools (SFPs) resulting from the elapsed time since the two units were shut down in January 2012. The licensee shut down Unit 2 for a scheduled refueling outage but never restarted the unit, and the licensee shut down Unit 3 the same month in response to a steam generator tube leak. The revisions support design basis changes made by the licensee associated with the implementation of "cold and dark" plant status as described in the PSDAR.

The NRC approved exemptions from certain emergency planning requirements in 10 CFR 50.47(b), 10 CFR 50.47(c)(2), and 10 CFR Part 50, Appendix E, Section IV, which became effective on June 5, 2015 (ADAMS Accession Nos. ML15105A349 and ML15126A461). These license amendments revised the SONGS emergency action level (EAL) scheme and emergency plan, respectively, to reflect the low likelihood of any credible accident at the plant in its permanently shut down and defueled condition that could result in radiological releases requiring offsite protective measures. The changes to the license were to provide conformance with the related exemptions granted to the licensee by NRC letter dated June 4, 2015 (ADAMS

Accession No. ML15082A204). The changes were reviewed, and appropriate conforming changes were properly addressed in the applicable revision and sections of the SONGS UFSAR.

The licensee submitted a license amendment request dated December 15, 2016 (ADAMS Accession No. ML16355A015), to revise the Permanently Defueled Emergency Plan (PDEP) into an Independent Spent Fuel Storage Installation (ISFSI)-Only Emergency Plan (IOEP), and to revise the EAL scheme into ISFSI-only EALs for SONGS, Units 1, 2, and 3 ISFSI. The proposed changes would reflect the new status of the facility, as well as the reduced scope of potential radiological accidents, once all spent fuel has been moved to dry cask storage within the onsite ISFSI.

The NRC issued amendments to the SONGS operating licenses to allow transition to an IOEP and EAL scheme on November 30, 2017 (ADAMS Accession No. ML17310B482). The NRC inspector determined that the SONGS IOEP and associated changes would provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency at the SONGS facility. The changes were reviewed, and appropriate conforming changes were properly addressed in the applicable revision and sections of the SONGS UFSAR.

License Amendment 169 (Unit 1), 237 (Unit 2), and 230 (Unit 3) were submitted on December 15, 2016, (ADAMS Accession No. ML16355A014) and approved by the NRC by letter dated January 9, 2018 (ADAMS Accession No. ML17345A657). These license amendments changed the operating licenses and technical specifications to reflect the removal of all spent nuclear fuel from the SONGS, Units 2 and 3, SFPs and its transfer to dry cask storage within an onsite ISFSI. These changes will more fully reflect the permanently shutdown status of the decommissioning facility, as well as the reduced scope of structures, systems, and components necessary to ensure plant safety once all spent fuel has been moved to the SONGS ISFSI.

The changes also made conforming revisions to the SONGS, Unit 1, technical specifications and combined them with the SONGS, Units 2 and 3, technical specifications. This license amendment will become effective as of the date the licensee submits a written notification to the NRC that all spent nuclear fuel assemblies have been transferred out of the SONGS SFPs and placed in storage within the onsite ISFSI. In addition, the changes were reviewed, and appropriate conforming changes were properly addressed in the applicable revision and section(s) of the SONGS UFSAR.

On December 20, 2016, the licensee announced the selection of AECOM and EnergySolutions as the decommissioning general contractor for SONGS. The joint venture between the two companies is called SONGS Decommissioning Solutions (SDS). The SDS organization manages the decommissioning activities as the decommissioning general contractor, which is described in the licensee's PSDAR.

The California Environmental Quality Act is the state equivalent of the federal National Environmental Policy Act. For SONGS, the California State Lands Commission (CSLC) will perform the California Environmental Quality Act review, which is triggered by the need to establish the final disposition for the offshore conduits that are under a CSLC lease. On February 11, 2019, the Final Environmental Impact Report was released by the CSLC. The CSLC held a public meeting on March 21, 2019, to consider the Final Environmental Impact Report and a lease application to decommission the offshore infrastructure associated with SONGS, Units 2 and 3. On October 17, 2019, the California Coastal Commission approved with conditions the Coastal Development Permit to begin decontamination and dismantlement

of the above grade structures at SONGS, which therefore begins active decommissioning activities at the site.

After the August 3, 2018, canister misalignment incident at SONGS ISFSI, the licensee committed on August 7, 2018, to an NRC review prior to resuming operations of spent fuel loading operations at SONGS. On July 15, 2019, SONGS resumed spent fuel transfer operations. At the time of this inspection, the licensee was loading and transferring the 41st canister onto the storage pad. The SDS organization had initiated planning for the site's decommissioning activities, which are scheduled to commence once the spent fuel has been moved to the ISFSI.

1 Decommissioning Performance and Status Review at Permanently Shutdown Reactors (71801)

1.1 Inspection Scope

The inspector reviewed documents, interviewed plant personnel, performed radiological surveys, and conducted site tours to assess the licensee's performance in the following areas:

- Status of ongoing decommissioning activities and planning for future activities,
- Operability and functionality of systems necessary for safe decommissioning such as radioactive effluent monitoring, SFP level and temperature control, and radiation protection monitors and alarms,
- Status of field conditions and decommissioning activities, and
- Status of fire protection program and facility housekeeping.

1.2 Observations and Findings

The licensee submitted its PSDAR on September 23, 2014, as required under 10 CFR 50.82(a)(4). The PSDAR provides the general dates for each decommissioning phase implementation period and associated activities for that period. The licensee stated that the implementation of the activities described under each period may overlap and not necessarily be implemented consecutively. The majority of activities described under Period 1, "Transition to Decommissioning," and Period 2, "Decommissioning Planning and Site Modifications," have been implemented, as described in previous inspection reports. The licensee, under its decommissioning general contractor, SDS, was planning and scheduling hazard mitigation activities in preparation for decommissioning, as described under Period 3, "Decommissioning Preparations and Reactor Internal Segmentation."

SDS was continuing to work on limited Authorized Limited SAFSTOR Hazard Mitigating Activities related activities. The inspector interviewed SDS responsible personnel regarding the progress of the hazard mitigation activities and determined that the planned activities were developed in accordance with procedures and regulatory requirements. The inspector attended meetings that included discussion of decommissioning activities as well as the current plant status for each day. The meetings provided participants with useful information about the daily status of plant

activities. The inspector also discussed with SDS senior management the schedule for the upcoming decommissioning activities at the site. SDS had a detailed plan pending the notice to proceed to Phase II activities from SCE. Phase II activities start major decontamination and demolition work activities.

The inspector performed tours of the facilities, including the Unit 2 and Unit 3 spent fuel handling building, command center, turbine building, ISFSI pad, and general areas along the west and east roads. The command center staffing met or exceeded technical specifications requirements during the inspection period. The operators were knowledgeable of plant conditions, including the status of the SFPs. The operators continuously monitored critical plant parameters including the SFP water levels. Procedures were available in the control room for use by the operators. Based on observations, the inspector determined that the licensee was adequately maintaining the material condition of the facilities, as well as the systems, structures, and components that supported spent fuel safety.

The inspector conducted independent radiological surveys during site tours. The inspector measured the ambient gamma exposure rates using a Thermo Scientific Radeye G (Serial No. 30728, Calibration Due Date 12/12/19). The inspector did not identify any radiation area that was not already identified and posted by the licensee. The observed radiological postings were in compliance with regulatory requirements. Radiological boundaries were well defined. Housekeeping was adequate for the work in progress.

Title 10 CFR 50.48(f) states, in part, that the licensee shall maintain a fire protection program to address the potential for fires that could cause the release or spread of radioactive materials, or result in a radiological hazard. In addition, Section 5.5.1.1.d of the Technical Specifications (TS), Appendix A to the two licenses, states that written procedures shall be established, implemented, and maintained for the fire protection program. The inspector reviewed the licensee's fire protection program for compliance with regulatory and license requirements.

Regulatory Guide 1.191, "Fire Protection Program for Nuclear Power Plants During Decommissioning and Permanent Shutdown," describes the methods acceptable to the NRC for complying with the NRC's regulations for fire protection programs for licensees in decommissioning. This regulatory guide is referenced in the licensee's implementing procedures, and the inspector compared the licensee's fire protection program to the guidance provided in the regulatory guide.

The licensee's fire protection program records included a fire hazards analysis. This document provided an analysis of the various plant areas and the fire protection requirements for those areas. The licensee also developed a detailed fire protection program document SO123-FP-1, "Operations Fire Protection Program," Revision 31, that described staff responsibilities, program elements, and record requirements. In addition, procedures were developed to implement the various program attributes such as system operations, maintenance, design control, staffing, and training.

According to 10 CFR 50.48(f), the objectives of the fire protection program are to:

- (1) reasonably prevent fires that could result in a radiological hazard from occurring;
- (2) rapidly detect, control, and extinguish those fires that do occur; and
- (3) ensure that the risk of fire-induced radiological hazards to the public, environment and plant

personnel is minimized. The inspector compared the licensee's fire protection program against the objectives provided in the regulations.

The inspector reviewed the licensee's ability to rapidly detect, control, and extinguish fires. The licensee installed and maintained equipment to detect fires including various types of smoke detectors and fire detection sensors. Fire suppression systems were in service including water storage tanks, pumps, valves, distribution piping, hose stations, sprinklers, and fire extinguishers throughout the plant. The inspector also confirmed that the licensee implemented a surveillance and preventive maintenance program for the equipment in service.

The inspector reviewed the licensee's staffing of the fire brigade. Section IV.D.2.b of SOP123-FP-1, "Operations Fire Protection Program," Revision 31, states the requirements for fire brigade staffing. The onsite fire brigade consisted of a minimum of two individuals, but the licensee routinely assigned at least three individuals per shift to the fire brigade. The fire brigade program procedure described the duties and responsibilities of the fire brigade during emergency situations. The inspector confirmed that the licensee continued to assign staff to the fire brigade.

The onsite fire brigade could be supplemented by offsite emergency staff, based on the specifics of the emergency. The inspector confirmed that the licensee had established a Memorandum of Agreement with the Camp Pendleton Fire Department for support services during certain emergencies. Site security and radiation protection staff were available to support the fire brigade as needed. For example, site security could help expedite the onsite arrival of offsite support services.

The inspector confirmed that the licensee had established a training program for fire brigade members, which included routine drills. The licensee maintained a list of qualified individuals who could be assigned to the fire brigade. The licensee also assigned a qualified individual to the position of fire marshal, separate from the fire brigade. The fire marshal was responsible for implementing portions of the fire protection program and to support the fire brigade as needed.

The inspector reviewed and confirmed that the routine surveillances and preventive maintenance tasks were scheduled at the frequencies established in site procedures. The surveillances and preventive maintenance activities included pump tests, flow tests, and equipment operability checks. Also, the licensee established and implemented procedures for routine inspection of combustibles, transient fire loads, and fire doors.

Finally, the third regulatory objective for the fire protection program was to ensure that the risk of fire-induced radiological hazards to the public, environment, and plant personnel was minimized. The licensee utilized a "defense-in-depth" concept to minimize the consequences and probability of fire events resulting in radiological releases. The defense-in-depth concept included a combination of administrative controls, physical fire protection features, emergency response capabilities, and protection of critical systems and components such as the SFPs and support equipment. As noted above, the licensee implemented a fire brigade, emergency response instructions, and training program to help minimize the risks of radiological releases caused by fires. Critical equipment such as hoses and fire extinguishers were staged in various areas to support emergency response operations.

1.3 Conclusion

The licensee continued to conduct decommissioning in accordance with the general guidance provided in the PSDAR. The licensee implemented an oversight program to ensure that contractors conducted decommissioning work activities in accordance with procedural requirements as well as licensee expectations. The licensee implemented operational, radiological, fire protection, and housekeeping programs to ensure safe storage of spent fuel.

2 **Spent Fuel Pool Safety at Permanently Shutdown Reactors (60801)**

2.1 Inspection Scope

The inspector reviewed documents and interviewed plant personnel to assess the licensee's performance in the following areas:

- Design, operational, and administrative measures are in place to prevent a substantial reduction in SPF coolant inventory under normal and accident conditions,
- SFP instrumentation, alarms, and leakage detection systems are adequate to assure safe wet storage of spent fuel,
- SFP water chemistry and cleanliness control programs maintain water purity standards, limits on radionuclide concentration, and minimum boron concentration in accordance with the technical specification requirements,
- Criticality controls are consistent with the applicable nuclear criticality safety analyses,
- Procedures, drawings, and PSDAR descriptions and operations regarding the SFP operation and power supplies are adequate, and
- Problem identification issues related to SFP activities are entered into the corrective action program at an appropriate threshold.

2.2 Observations and Findings

The technical specifications specify the limiting conditions of operation (LCO) in the fuel storage pools in order to maintain the fuel in a subcritical condition. The LCOs include Technical Specifications 3.1.1 for the minimum level of 23 feet of water between the top of the fuel bundle and fuel pool surface, and Technical Specifications 3.1.2 for the boron concentration to be maintained greater than or equal to 2,000 parts per million (ppm) in order to preserve the assumptions of the fuel handling accident analysis. The inspector observed the SFP water level was being maintained approximately 27 feet above of the top of the fuel bundles in both pools, and the boron concentration was maintained at 2623 ppm in Unit 2 and 2613 ppm in Unit 3.

The inspector reviewed the surveillance history since the last inspection and the surveillances were completed as required and no results were below the technical specifications identified above. In addition, SONGS UFSAR, Section 9.1.2.3, Safety Evaluation required the SFP coolant temperature be maintained between 50° Fahrenheit (°F) and 160°F. The inspector observed SPF temperatures in Units 2 and 3 as 70°F and 69°F respectively.

The inspector observed the SFP island equipment in Units 2 and 3, reviewed the corrective actions generated for the SFP systems, and reviewed surveillances. The inspector discussed with the operations staff the licensee's observations of the equipment and determined that the SFP island cooling and makeup systems were functioning adequately. The inspector concluded the systems were being properly maintained and within technical specifications. At the time of the inspection, there was no evidence of liner leakage in either the Units 2 or 3 SFPs.

The inspector observed the radiation monitoring system in the Units 2 and 3 SFP handling building, in addition to the display and alarm capability in the Command Center using the command center data acquisition system.

2.3 Conclusion

The SONGS, Units 2 and 3, SFPs were being maintained in accordance with technical specifications and procedural requirements. The licensee was safely storing spent fuel in wet storage.

3 **Adverse Weather Protection (71111.01)**

3.1 Inspection Scope

The inspector reviewed documents and interviewed plant personnel to assess the licensee's performance in the following areas:

- Weather-related equipment deficiencies identified during the previous year have been corrected prior to the onset of seasonal extremes,
- Licensee implementation of the seasonal extreme weather preparation procedures and compensatory measures for the seasonal extremes, and
- Risk significant systems that are required to be protected from the seasonal extreme weather conditions are evaluated.

3.2 Observations and Findings

The inspector discussed the preparations for seasonal readiness and lessons learned with several SDS staff members specifically regarding the actions taken by SDS to ensure those systems important to decommissioning safety would not be impacted during seasonal extreme weather conditions, which are primarily wind and rain. SDS maintenance and facility staff were currently in the process of completing the work order to prepare the site and supporting equipment for the winter readiness review. The

inspector also conducted a walk-down of the plant to view preparations as required by procedure.

3.3 Conclusions

The licensee had initiated its adverse weather preparations in accordance with the applicable regulatory and license requirements.

4 **Exit Meeting Summary**

On November 21, 2019, the NRC inspector presented the final inspection results to Mr. Lou Bosch, Plant Manager and other members of the licensee's staff. The inspector asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified with the exception of all SDS procedures and documents reviewed during the inspection, which were marked as proprietary.

SUPPLEMENTAL INSPECTION INFORMATION
KEY POINTS OF CONTACT

Licensee Personnel

A. Bates, SCE, Regulatory Affairs and Oversight Manager
L. Bosch, SCE, Plant Manager
S. Mannon, SDS, Regulatory Affairs Manager
B. Corbett, SDS, Radiation Protection Manager
J. Sofie, SDS, D&D Work Control Manager
J. McGuirt, SDS, Site Support Services Manager
M. Reitzler, SDS, Maintenance Manager
D. Arai, SCE, Fire Protection Engineer
J. Appel, SDS, Fire Protection Engineer
W. Richter, SDS, Fire Marshall
R. Kalman, SDS, Operations Project Director
D. Evans, SCE, Regulatory Affairs

INSPECTION PROCEDURES USED

IP 71801 Decommissioning Performance and Status Review at Permanently Shutdown Reactors
IP 60801 Spent Fuel Pool Safety at Permanently Shutdown Reactors
IP 71111.01 Adverse Weather Protection

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened/Closed

None

Discussed

None

LIST OF ACRONYMS

ADAMS	Agencywide Documents Access and Management System
ALARA	As Low As is Reasonably Achievable
CFR	<i>Code of Federal Regulations</i>
CSLC	California State Lands Commission
ISFSI	Independent Spent Fuel Storage Installation
LCO	Limiting Condition of Operation
NRC	Nuclear Regulatory Commission
PDEP	Permanently Defueled Emergency Plan
PSDAR	Post-Shutdown Decommissioning Activities Report
SDS	SONGS Decommissioning Solutions
SCE	Southern California Edison Company
SFP	Spent Fuel Pool
SONGS	San Onofre Nuclear Generating Station
TS	Technical Specifications
UFSAR	Updated Final Safety Analysis Report

SAN ONOFRE NUCLEAR GENERATING STATION – NRC INSPECTION REPORT
05000361/2019-006; 05000362/2019-006 - DATED DECEMBER 9, 2019

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