

SMUD

SACRAMENTO MUNICIPAL UTILITY DISTRICT
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DPG 10-002

January 5, 2010

U.S. NRC Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Docket 50-312
Rancho Seco Nuclear Generating Station
License DPR-54

Docket 72-11
Rancho Seco Independent Spent Fuel Storage Installation
License SNM-2510

REPORT OF CHANGES TO RANCO SECO QUALITY PROGRAM THAT DO NOT REQUIRE PRIOR NRC APPROVAL

Attention: John Hickman & Christopher Staab

In accordance with 10 CFR 50.54(a)(3) and 10 CFR 50.4(b)(7), we are submitting a copy of changes to the Rancho Seco Quality Manual (RSQM) that do not reduce commitments in the quality assurance program previously accepted by the NRC. Changes to the quality program that do not reduce commitments in the program can be made without prior NRC approval.

During calendar year 2009, we revised RSQM Section I "Organization" to reflect the organizational changes that were made after completing the first phase of Rancho Seco decommissioning. These organizational changes are administrative and reflect updated position titles and responsibilities. The RSQM continues to fully implement the requirements of 10 CFR Part 50, Appendix B. The individuals and organizations performing quality assurance functions continue to have sufficient authority, organizational freedom, and independence from cost and schedule issues.

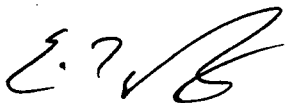
Rancho Seco staff concluded that this revision to the RSQM does not reduce commitments in the quality program previously accepted by the NRC. In accordance with 10 CFR 50.54(a)(3), we have implemented these changes without prior NRC approval.

There were no other changes to the RSQM during calendar year 2009.

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FSME

If you or members of your staff have any questions requiring additional information or clarification, please contact me at (916) 732-4817.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. Ronningen', with a stylized flourish at the end.

Einar Ronningen
Superintendent, Rancho Seco assets

Cc: NRC, Region IV

MANUAL: RANCHO SECO QUALITY MANUAL

NUMBER: RSQM-SECTION I

TITLE: ORGANIZATION

REVISION: 14

PAGE 1 OF 4

LEAD DEPARTMENT:

EFFECTIVE DATE: 10/12/2009

NUCLEAR QUALITY ASSURANCE

REVISION SUMMARY:

1. Major revision to reflect the long term monitoring organization.

I. ORGANIZATION

1.0 PURPOSE

This section describes the Sacramento Municipal Utility District (SMUD) organization and personnel responsible for establishing, implementing, and verifying the Quality Assurance Program (QAP) at the Rancho Seco nuclear facility, which includes the Rancho Seco Nuclear Generating Station (RSNGS) licensed under 10 CFR Part 50 and the Rancho Seco Independent Spent Fuel Storage Installation (ISFSI) licensed under 10 CFR Part 72.

2.0 REFERENCE DOCUMENTS

- 2.1 10 CFR 50, Appendix B, Criterion I, Organization
- 2.2 ANSI N45.2-1971, Section 3, Organization
- 2.3 Safety Guide 33/ANSI N18.7, Administrative Controls for Nuclear Power Plants
- 2.4 Rancho Seco Quality Manual, Appendix A
- 2.5 10 CFR 71.103, Quality Assurance Organization
- 2.6 10 CFR 72.142, Quality Assurance Organization

3.0 POLICY

- 3.1 The establishment and implementation of the Rancho Seco QAP, which is comprised of this Rancho Seco Quality Manual (RSQM) and the RSQM implementing procedures, shall be SMUD's responsibility. Some QAP functions may be delegated to other SMUD approved external organizations, but overall responsibility for the QAP remains with SMUD.
- 3.2 Definitive lines of authority, responsibility, and communication shall be established for those organizations involved in the QAP.
- 3.3 Quality Assurance personnel assigned to the Rancho Seco nuclear facility have defined responsibilities and organizational freedom to identify problems that affect quality; to initiate, recommend, or provide solutions; and to verify implementation of solutions. They have the authority to initiate action to stop

unsatisfactory work pending implementation of necessary corrective action to bring the unsatisfactory conditions into conformance.

- 3.4 The organizational structure and functional responsibility assignments shall be such that attainment of program objectives is accomplished by individuals or groups who inspect, examine, audit or otherwise verify conformance to established requirements, and who are independent of the individuals or groups who performed the original activity.

4.0 ORGANIZATION AND REQUIREMENTS

- 4.1 The General Manager (GM) through the Assistant General Manager (AGM), Energy Supply shall have corporate responsibility for overall safe operation of the Rancho Seco nuclear facility and shall take any measures needed to ensure acceptable performance of the staff in providing long term monitoring of the remaining radioactive waste.
- 4.2 The Superintendent, Rancho Seco Assets reports directly to the Manager, Power Generation. The Superintendent, Rancho Seco Assets assures that the Rancho Seco nuclear facility is properly staffed and adequately budgeted to ensure staff can safely carry out their responsibilities. The Superintendent, Rancho Seco Assets also coordinates quality concerns with the Quality Assurance group.

The Superintendent, Rancho Seco Assets is responsible for the safe and reliable operation of RSNGS, pursuant to 10 CFR Part 50, and the ISFSI, pursuant to 10 CFR Part 72. The Superintendent, Rancho Seco Assets has the responsibility and authority to implement the QAP and ensure optimum quality performance of the Rancho Seco nuclear facility.

The Superintendent, Rancho Seco Assets is responsible for the administrative actions necessary to ensure that the QAP is implemented by the groups under his direction. To this extent, the Superintendent, Rancho Seco Assets shall maintain continuing involvement in quality matters and shall assess the scope, status, implementation, and effectiveness of the QAP through the review of Quality Assurance Audits and Surveillances.

- 4.3 The Manager, Audit Services, through the Principal Quality Engineer, is responsible for the Rancho Seco nuclear quality assurance program. The Quality Assurance group is independent from operating pressures or other lines of authority, and ensures an active QAP is implemented at the Rancho Seco nuclear facility in accordance with regulatory requirements. The

Quality Assurance group has the authority to take any issue concerning the quality of operations at the Rancho Seco nuclear facility to the Manager, Power Generation.

- 4.4 The Quality Assurance group shall have sufficient authority and organizational freedom to identify problems that affect quality, recommend solutions, and verify implementation of solutions, as appropriate. Commensurate with this responsibility is the authority to initiate action to stop unsatisfactory work pending correction of the unsatisfactory condition.
- 4.5 Corporate and on-site organizational responsibilities are described in greater detail in Rancho Seco Administrative Procedure RSAP- 0101. Specific duties and responsibilities for organizations whose activities affect quality are described in RSQM Sections II through XVIII and Appendix A.
- 4.6 The Superintendent, Rancho Seco Assets advises the Manager, Power Generation on matters related to the safety of operations at the Rancho Seco nuclear facility.
- 4.7 The Superintendent, Rancho Seco Assets performs safety reviews and provides onsite management oversight of Rancho Seco nuclear facility activities.
- 4.8 The Superintendent, Rancho Seco Assets is responsible for reviewing all Potential Deviations from Quality (PDQ) to determine if a condition is a Deviation from Quality (DQ) and requires determination of the cause, extent, remedial corrective actions, and actions to prevent recurrence. The Superintendent, Rancho Seco Assets reviews and approves DQ dispositions and assigns corrective actions identified in DQ dispositions. The Superintendent, Rancho Seco Assets also determines whether a PDQ is potentially reportable pursuant to 10 CFR 21.

5.0 GENERAL RESPONSIBILITIES

The nuclear organization is involved in the long term monitoring of the Rancho Seco nuclear facility and is responsible for describing and clearly defining the duties and authority of individuals whose work affects quality. RSAP-0101 defines the Rancho Seco nuclear facility organization and the responsibilities associated with each onsite work group. Each work group has the responsibility to ensure that their procedures implement QAP requirements.