



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 27, 2015

Mr. Thomas J. Palmisano
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, UNITS 1, 2, AND 3 AND
INDEPENDENT SPENT FUEL STORAGE INSTALLATION – REQUEST FOR
ADDITIONAL INFORMATION RE: DECOMMISSIONING QUALITY
ASSURANCE PROGRAM REVIEW (TAC NOS. MF5215, MF5216, AND
MF5217)

Dear Mr. Palmisano:

By letter dated November 13, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14322A157), Southern California Edison (SCE) submitted a proposed revision of the Decommissioning Quality Assurance Program (DQAP) for San Onofre Nuclear Generating Station (SONGS), Units 1, 2, and 3, and the Independent Spent Fuel Storage Installation for U.S. Nuclear Regulatory Commission (NRC) review and approval.

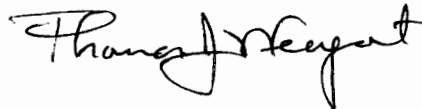
In order to complete its review, the NRC staff requests additional information as specified in the Enclosure. The staff's request was clarified during a telephone conversation held with your staff on March 18, 2015. As discussed with your staff on March 24, 2015, please provide a response by April 20, 2015.

T. Palmisano

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If you have any questions, please contact me at (301) 415-4037 or via e-mail at Thomas.Wengert@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas J. Wengert". The signature is written in a cursive style with a large, stylized initial "T".

Thomas J. Wengert, Senior Project Manager
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-206, 50-361,
50-362, and 72-41

Enclosure:
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

REGARDING DECOMMISSIONING QUALITY ASSURANCE PROGRAM

SOUTHERN CALIFORNIA EDISON

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 1, 2 AND 3 AND

INDEPENDENT SPENT FUEL STORAGE INSTALLATION

DOCKET NOS. 50-206, 50-361, 50-362, AND 72-41

By letter dated November 13, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14322A157), Southern California Edison requested the Nuclear Regulatory Commission (NRC) staff to review and approve the Decommissioning Quality Assurance Program (DQAP) for San Onofre Nuclear Generating Station (SONGS), Units 1, 2 and 3, and the Independent Spent Fuel Storage Installation. The following additional information is necessary for the NRC staff to complete its review:

1. The requirements of 10 CFR Part 50, Appendix B, Criterion II, "Quality Assurance Program," states in part, "The applicant shall regularly review the status and adequacy of the quality assurance program. Management of other organizations participating in the quality assurance program shall regularly review the status and adequacy of that part of the quality assurance program which they are executing."

Clarify how the SONGS DQAP meets this requirement or provide justification on why it is not needed.

2. The requirements of 10 CFR Part 50, Appendix B address the quality assurance requirements for nuclear power plants and fuel cycle processing plants; the requirements of 10 CFR Part 72, Subpart G address the quality assurance requirements for independent storage of spent nuclear fuel; and the requirements of 10 CFR Part 71, Subpart H address the quality assurance requirements for packaging and transportation of radioactive material.

The NRC staff has endorsed industry guidance as acceptable for complying with the above regulations. Specifically, Appendix E of the SONGS DQAP references the American Society of Mechanical Engineers (ASME) NQA-1-2008 /2009 Addendum, "Quality Assurance Requirements for Nuclear Facility Applications"; Regulatory Guide 1.191, "Fire Protection Program for Nuclear Power Plants During Decommissioning and Permanent Shutdown"; and NRC Regulatory Issue Summary (RIS) 2000-18, "Guidance on Managing Quality Assurance Records in Electronic Media." Clarify to what extent the DQAP commits to meeting the references listed in Appendix E.

Clarify what codes and standards will be used to implement the DQAP at SONGS. Address how proposed reductions in commitments, alternatives or exceptions will be evaluated or considered for review by the NRC staff.

Enclosure

3. The requirements of 10 CFR Part 50, Appendix B, Criterion VII, "Control of Purchased Material, Equipment, and Services," states in part, that, "Measures shall be established to assure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents. These measures shall include provisions, as appropriate, for source evaluation and selection, objective evidence of quality furnished by the contractor or subcontractor, inspection at the contractor or subcontractor source, and examination of products upon delivery."

Section 7.0, "Control of Purchased Materials, Equipment and Services," of the SONGS DQAP states, in part, "A Supplier's QA Program that satisfies specified quality requirements shall be listed on the SONGS Evaluated Suppliers List."

Clarify the process for evaluation of suppliers prior to being listed and maintained on the SONGS Evaluated Suppliers List.

4. The requirements of 10 CFR Part 50, Appendix B, Criterion VII, states in part, that, "Measures shall be established to assure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents. These measures shall include provisions, as appropriate, for source evaluation and selection, objective evidence of quality furnished by the contractor or subcontractor, inspection at the contractor or subcontractor source, and examination of products upon delivery."

Section 7.0, of the SONGS DQAP states, "Suppliers of commercial grade calibration services may be qualified based on their accreditation by nationally-recognized accrediting body, as an alternative to qualification by supplier audit, commercial grade survey, or in-process surveillance."

The NRC staff has approved a similar alternative outlined in the NRC staff's safety evaluation for Arizona Public Service Company in a letter dated September 28, 2005 (ADAMS Accession No. ML052710224).

Clarify if SONGS will be committing to the conditions contained in the alternative outlined in the NRC staff's safety evaluation for Arizona Public Service Company.

5. The requirements of 10 CFR Part 50, Appendix B, Criterion VII, states in part, "The effectiveness of the control of quality by contractors and subcontractors shall be assessed by the applicant or designee at intervals consistent with the importance, complexity, and quantity of the product or services."

Section 7 of the SONGS DQAP states, "Items important to safety SSCs [structures, systems and components] and services from suppliers whose QA Program has not been reviewed or accepted may be used, provided additional controls such as source inspection, special receipt inspections, and/or testing are imposed. These additional controls shall be documented and approved by the appropriate level of management."

Clarify if this alternative is referring to the application of commercial grade dedication. Additionally, if commercial grade dedication will be implemented, what industry guidance will be utilized?

6. The requirements of 10 CFR Part 50, Appendix B, Criterion VII, states, in part, "Documentary evidence that material and equipment conform to the procurement requirements shall be available at the nuclear power plant or fuel reprocessing site prior to installation or use of such material and equipment. This documentary evidence shall be retained at the nuclear power plant or fuel reprocessing plant site and shall be sufficient to identify the specific requirements, such as codes, standards, or specifications, met by the purchased material and equipment."

Clarify how the above requirements are addressed in the SONGS DQAP.

7. The requirements of 10 CFR Part 50, Appendix B, Criterion XVIII, "Audits," states, in part, "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program..."

Section 18, "Audits," of the SONGS DQAP states, "Internal audits of the QA Program shall be on a bi-annual cycle with a 90 day grace period..."

Appendix B of the DQAP lists guidance and regulatory commitments. Regulatory Guide 7.10, "Establishing Quality Assurance Programs for Packaging Used in Transport of Radioactive Material," Revision 2, issued March 2005, is listed. The Regulatory Guide addresses an audit interval of annual.

Clarify the frequency for internal audits.

8. Regarding personnel training and qualification, in Section 2 of the proposed SONGS DQAP, it states, in part: "Members of the SONGS staff (including audit and inspection personnel) shall have sufficient qualifications to perform their assigned duties. Implementing procedures provide the criteria utilized for determining and assessing appropriate staff qualifications."

Please clarify what "sufficient qualifications" means in this section.

T. Palmisano

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If you have any questions, please contact me at (301) 415-4037 or via e-mail at Thomas.Wengert@nrc.gov.

Sincerely,

/RA/

Thomas J. Wengert, Senior Project Manager
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-206, 50-361,
50-362, and 72-41

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Request for Additional Information

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KKavanagh, NRO
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PPrescott, NRO
JTapp, NMSS
MVaaler, NMSS

ADAMS Accession No. ML15083A455

*via memo

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NAME	TWengert	PBlechman	KKavanagh
DATE	3/26/15	3/25/15	2/23/15
OFFICE	NRR/DORL/LPL4-2/BC	NRR/DORL/LPL4-2/PM	
NAME	MKhanna	TWengert	
DATE	3/26/15	3/27/15	

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