

April 20, 2015

10 CFR 50.54(a)

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

**Subject: Docket Nos. 50-206, 50-361, 50-362, and 72-041
Response to a Request for Additional Information Regarding
Decommissioning Quality Assurance Plan
San Onofre Nuclear Generating Station, Units 1, 2, 3 and Independent
Spent Fuel Storage Installation**

- References: 1) Letter from T. J. Palmisano (SCE) to Document Control Desk (NRC) dated November 13, 2014; Subject: Docket No. 50-206, 50-361, 50-362, and 72-041 Request for Approval of Decommissioning Quality Assurance Program for San Onofre Nuclear Generating Station Units 1, 2 and 3 and Independent Spent Fuel Storage Facility. (ADAMS Accession No. ML14322A157)
- 2) Letter from T. J. Wengert (NRC) to T. J. Palmisano (SCE) dated March 27, 2015 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) (ADAMS Accession No. ML15803A455)

Dear Sir or Madam:

By letter dated November 13, 2014 (ADAMS Accession No. ML14322A157), Southern California Edison submitted to the Nuclear Regulatory Commission (NRC) staff for review and approval 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 (ISFSI) (Reference 1).

By letter dated March 27, 2015 (Reference 2), the NRC provided a Request for Additional Information (RAI) regarding Reference 1. Enclosure 1 to this letter provides a response to all eight information requests contained in the RAI. The responses provided in Enclosure 1 propose several revisions to clarify the language of the DQAP.

Enclosure 2 is the revised DQAP with all changes made as a result of clarification and additional information needed to resolve the eight information requests.

The eight information requests were clarified during a telephone conversation held on March 18, 2015. The responses provided for the eight information requests are consistent with the clarification provided in the telephone conversation.

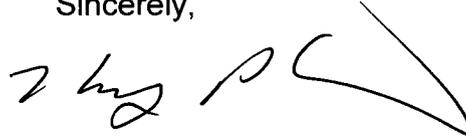
There are no new regulatory commitments in this letter or to Enclosure 1 to this letter.

If you have any questions or require any additional information, please contact Mr. Mark Morgan at (949) 368-6745.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 4/20/2015
(Date)

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Morgan", with a large, sweeping flourish extending to the right.

Enclosures: 1. Responses to NRC Request for Additional Information regarding the San Onofre Decommissioning Quality Assurance Program
2. Decommissioning Quality Assurance Program (DQAP).

cc: M. L. Dapas, Regional Administrator, NRC Region IV
R. L. Keller, NRC Region IV, San Onofre Units 2 and 3
T. J. Wengert, NRC Project Manager, SONGS Units 2 and 3
M. G. Vaaler, NRC Project Manager, San Onofre Unit 1
W. C. Allen, NRC Project Manager, SONGS ISFSI

Enclosure 1

**Responses to NRC Request for Additional Information regarding the San Onofre
Decommissioning Quality Assurance Program**

Responses to NRC Request for Additional Information regarding the San Onofre Decommissioning Quality Assurance Program

By letter dated March 27, 2015 the NRC provided a Request for Additional Information (RAI) regarding Southern California Edison's (SCE's) Decommissioning Quality Assurance Program (DQAP). The NRC RAIs and the SCE responses are provided below.

NRC Request for Additional Information (RAI) 1.0

The requirements of 10 CFR Part 50, Appendix B, Criterion II, 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 Decommissioning Quality Assurance Program (DQAP) meets this requirement or provide justification on why it is not needed.

Response to RAI 1.0

This question is addressed as two separate items: Part A; review of the status and adequacy of the SONGS overall Quality Assurance (QA) program; and Part B; the regular review of status and adequacy of internal SONGS organizations' implementation of portions of the QA programs which they are responsible for by responsible organizational management.

Part A

Regular review of the status and adequacy of the Quality Assurance (QA) program is discussed in section 1.0 of the DQAP under the topic, "Reporting." The DQAP states, "The CNO shall periodically have assessments performed to evaluate the effectiveness of the SONGS QA Program. These assessments are performed by individuals designated by the CNO who are independent of SONGS oversight activities and who have the appropriate level of expertise in the activities assessed." To clarify this review requirement SONGS proposes the following wording change:

"The CNO shall periodically have an external audit performed to evaluate the effectiveness of the SONGS QA Program. These external audits are performed by individual(s) designated by the CNO who are independent of SONGS oversight activities and who have the appropriate level of expertise in the activities audited. These periodic external audits shall be performed on a 24 month frequency with a 90 day grace period which is not to impact the established 24 month cycle for the audit. The external audit results are communicated via a written report in a timely manner to a level of management having the authority to execute effective corrective action. In addition, these results are reported to the SCE President through the SONGS CNO."

This change will also require the addition of a topic for Records at the end of Section 1, "Organization" to read as follows:

Records

Records of the biennial audit of the QA program including audit plan, checklist, audit report and the record of completion of corrective action(s) shall be retained in accordance with proper implementing procedures.

Part B

The requirement that 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 is controlled through an implementing procedure.

Management organizations outside of Nuclear Oversight utilize SO123-XV-SA-1, *Self-Assessment Process*, to regularly review the status and adequacy their programs. Division Managers are responsible for ensuring snapshot assessments are conducted for the following programs per attachment 7 of that procedure: Operations, Maintenance, Performance Improvement, Safety, Human Performance, Emergency Preparedness, Nuclear Safety Concerns, Security, and Engineering. Fire Protection and Radiation Protection have specific reference to the frequency of management reviews within their program documents.

NRC Request for Additional Information (RAI) 2.0

The requirements of 10 CFR Part 50, Appendix B addresses 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 addresses 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, the Appendix E of the 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.

Response to RAI 2.0

In order to clarify the codes and standards that SCE commits to in the DQAP, Appendixes B and E were revised as indicated at the end of this response. Appendix B, *Regulatory Requirements and Commitments* was revised to reflect the addition of Regulatory Guide 1.191, *Fire Protection Program For Nuclear Power Plants During Decommissioning and Permanent Shutdown (May 2001)* and NRC RIS 2000-18, *Guidance on Managing Quality Assurance Records in Electronic Media*, to the list of regulatory documents that SCE commits to in the DQAP. SCE also listed the exception to the 12-month audit cycle stated in Regulatory Guide 7.10, *"Establishing Quality Assurance Programs for Packaging Used in the Transportation of Radioactive Material"* (Revision 2 – March 2005).

Likewise SCE revised Appendix E, *References*; by removing those regulatory documents that SCE commits to in the DQAP to Appendix B and listing reference-only regulatory documents in Appendix E (see below lists).

In the future, proposed changes in the NRC-accepted DQAP (including any proposed exceptions or alternatives to the codes and standards listed in Appendix B to the DQAP) will be evaluated by SCE to determine whether the changes involve a reduction in commitment per 10 CFR 50.54(a)(3). In accordance with 10 CFR 50.54(a)(4), any proposed changes in the NRC-accepted DQAP that involve a reduction in commitment will be submitted to NRC for approval.

Appendix B – Regulatory Requirements and Commitments

Regulatory Commitments

1. 10 CFR 50 Appendix B, *Quality Assurance Criteria for Nuclear Power Plants and Fuel Processing Plants*
2. 10 CFR 71 Subpart H, *Quality Assurance for Packaging and Transportation of Radioactive Material*
3. 10 CFR 72, Subpart G, *Quality Assurance for Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste*
4. Regulatory Guide 7.10, *“Establishing Quality Assurance Programs for Packaging Used in the Transportation of Radioactive Material”* (Revision 2 – March 2005), with exception to the annual audit frequency. SONGS is on a 24-month audit frequency in accordance with implementing plant procedures.
5. NUREG/CR-6407, *Classification of Transportation Packaging and Dry Fuel Storage System Components According to Important to Safety (2/96)*
6. Regulatory Guide 1.191, *Fire Protection Program For Nuclear Power Plants During Decommissioning and Permanent Shutdown (May 2001)*
7. NRC RIS 2000-18, *Guidance on Managing Quality Assurance Records in Electronic Media*

Appendix E – References

- 1) ASME NQA-1-2008 / 2009 Addenda *Quality Assurance Requirements for Nuclear Facility Applications*.
- 2) NUREG 1757, *Consolidated Decommissioning Guidance*; Volume 1 – Revision 2, *Decommissioning Process for Material Licenses*

NRC Request for Additional Information (RAI) 3.0

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 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.

Response to RAI 3.0

The Evaluated Suppliers List (ESL) is maintained by SONGS Nuclear Oversight personnel using implementing procedure SO123-XI-8, *Supplier Evaluation and Qualification*. The procedure requires Nuclear Oversight to evaluate supplier quality assurance programs for compliance to the applicable nuclear standards and for adequacy of controls with respect to the specified critical characteristics in accordance with SONGS procedure SO123-XII-18.14, *Evaluation of Supplier Audits/Surveys* and SO123-XII-18.19, *Supplier Audits* as applicable. Additionally, SONGS continues to be a member of Nuclear Procurement Issues Committee (NUPIC) and the Nuclear Energy Institute (NEI) and continues to use and participate in audits conducted by NUPIC and NEI to qualify suppliers for Augmented Quality, Important to Safety and in the rare case Safety Related material and services.

NRC Request for Additional Information (RAI) 4.0

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 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 San Onofre Nuclear Generating Station will be committing to the conditions contained in the alternative outlined in the NRC staff's safety evaluation for Arizona Public Service Company.

Response to RAI 4.0

Section 7.0 of the 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.

It is proposed to revise the subject wording in section 7.0 of the DQAP as follows:

"The suppliers of calibration services for SONGS will be qualified to perform calibrations by fully satisfying all regulatory requirements, specifically an approved Appendix B calibration program."

Based on this wording SCE will not be committing to the alternative outlined in the NRC staff's safety evaluation for Arizona Public Service Company.

NRC Request for Additional Information (RAI) 5.0

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 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?

Response to RAI 5.0

In the following statement in section 7.0 of the DQAP there was confusion with service only suppliers and Commercial Grade Dedication (CGD).

"Items important to safety SSCs [Structures, Systems and Components] and services from suppliers who's QA Program has not been reviewed or accepted, those suppliers 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."

This statement was intended to address the "procurement of services only". To clarify the intended meaning, SCE proposes to revise this language in Section 7.0 as follows:

"For the acquiring of services only, such as third-party inspection, engineering and consulting services; auditing and installation; repair, overhaul, or maintenance work, from suppliers whose QA Program has not been reviewed or accepted, those suppliers may be used provided additional controls such as technical verification of data produced, surveillance and/or audit of the activity, or review of objective evidence are employed. These additional controls shall be documented in the request for services and approved by the appropriate level of management."

With regards to CGD, active safety related components will no longer be procured at SONGS due to the decommissioning status of the site. As such, SCE does not believe that any CGD will need to be performed, and therefore propose rewording the CGD comments in DQAP Section 7.0 from:

"Spare and replacement parts are procured such that their performance and quality are at least equivalent to those of the parts that will be replaced. Commercial Grade items are controlled by written procedure."

To the following:

"Due to the elimination of all active safety related components at SONGS based on the decommissioning status of the site, SCE will no longer perform Commercial Grade

Dedication of parts or components. If future needs for CGD arise, SONGS will use qualified contracted services with an approved and established CGD program.”

NRC Request for Additional Information (RAI) 6.0

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 DQAP.

Response to RAI 6.0

Currently Section 7.0 of the DQAP states the following:

“Source verification and/or receipt inspection activities are performed to assure that the requirements of the procurement documents have been met. Accepted items are appropriately marked, removed from the inspection area, and located in a controlled storage area until use.”

To better describe the receipt inspection process and requirements that section will be revised to read as follows:

“Receiving inspection shall verify by objective evidence the acceptability of items in accordance with facility procedures. Accepted items are appropriately marked, removed from the inspection area, and located in a controlled storage area until use. Documentary evidence shall be retained at SONGS and shall be sufficient to identify the specific requirements, such as codes, standards, or specifications, met by the purchased material and equipment.”

Additionally, the requirement to create and retain documentary evidence that material and equipment conform to the procurement requirements sufficient to identify the specific requirements, such as codes, standards, or specifications, met by the purchased material and equipment is established in section 6.1 & 6.9, respectively of SONGS procedure SO123-XII-20.4, *Receiving Inspection*.

NRC Request for Additional Information (RAI) 7.0

The requirements of 10 CFR Part 50, Appendix B, Criterion XVIII, 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 of the DQAP states, “Internal audits of the QA Program shall be on a biannual cycle with a 90 day grace period...”

Appendix B of the DQAP lists guidance and regulatory commitments. Regulatory Guide 7.10 is listed. The Regulatory Guide addresses an audit interval of annual.

Clarify the frequency for internal audits.

Response to RAI 7.0

DQAP Section 18 as written states:

“Audit scopes and schedules are based upon the status of work progress, important to safety activities being performed, regulatory requirements and prior experience with the organization being audited. Internal audits of the QA Program shall be on a bi-annual cycle with a 90 day grace period unless a more frequent periodicity is required by regulations.”

SCE proposes a clarification to the wording of DQAP Section 18:

“Audit scopes and schedules are based upon the status of work progress, important to safety activities being performed, regulatory requirements and prior experience with the organization being audited. Internal audits for the SONGS Decommissioning Quality Assurance Plan (DQAP) shall continue on a 24-month cycle with a 90 day grace period. Grace periods are not intended to be used repetitively, merely as an administrative convenience to extend audit intervals. Therefore, the next performance due date is based on the originally scheduled date.

When specific audits are identified as requiring a more frequent periodicity, for example, annual audits of Emergency Preparedness and Safeguards, the shortest periodicity will be adhered to for activities covered by those specific regulatory requirements. The frequency of internal audits will be prescribed by the plant implementing procedure which governs the conduct of QA audits.”

SCE commits to Regulatory Guide 7.10, *“Establishing Quality Assurance Programs for Packaging Used in the Transportation of Radioactive Material”* (Revision 2 – March 2005), with exception to Section 18.2, Scheduling of Audits, requiring that management audits should be conducted at least once every 12 months. SONGS is following a common industry practice of using a 24-month audit frequency.

NRC Request for Additional Information (RAI) 8.0

Regarding personnel training and qualification, in Section 2 of the proposed SONGS Decommissioning Quality Assurance Program, 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.

Response to RAI 8.0

Section 2.0 of the DQAP contains the following wording:

“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....”

To clarify what is meant by “sufficient qualifications,” it is proposed that Section 2.0 of the DQAP be revised to state:

“Members of the SONGS staff (including audit and inspection personnel) shall have the appropriate qualifications necessary to perform their assigned duties

defined in implementing procedures listed in Appendix H of the DQAP. These implementing procedures provide the criteria utilized for determining and assessing appropriate staff qualification. Additionally, plant Technical Specifications and the Permanently Defueled Technical Specifications both cite references that stipulate the use of specific industry standards addressing qualifications.”

The following Appendix has been added to the DQAP to provide a matrix of DQAP sections and corresponding implementing programs and procedures in which the appropriate training requirements are prescribed.

Appendix H: DQAP Implementing Programs/Procedures

DQAP Section	QA Criterion Title	Implementing Programs and Procedures	
1.0	Organization	SO123-VII-20	Radiation Protection Program
		SO123-XII-1.3	Authorities and Duties of Nuclear Oversight Personnel
		SO123-XII-18.17	Nuclear Oversight Board Functions and Responsibilities
		SO123-EP-1	SONGS Emergency Plan Implementation
		SO123-FP-1	Fire Protection Program
		SO123-MA-1	Maintenance Division
		SO123-CH-1	Chemistry Program
		SO123-SN-1	Special Nuclear Material Accountability Program
		SO123-XV-60.1	Onsite Review Committee (OSRC)
2.0	Quality Assurance Program	SO123-SE-1	Security
		SO123-XV-SA-1	Self-Assessment Process
		SO123-ODCM	SONGS Offsite Dose Calculation Manual
		SO123-XII-1.3	Authorities and Duties of Nuclear Oversight Personnel
		SO123-XV-33	Personnel Qualification Program for the San Onofre Organization
		SO123-XV-5.3	Maintenance Rule Program
		SO123-HK-1	Site Housekeeping and Cleanness Control Program
		SO123-RM-1	Radiological Environmental Monitoring Program
3.0	Design Control	SO23-XXI-TRN	Conduct of Training
		SO123-XXIV-10.1	Engineering Design Change Process - NECPS
		SO123-CC-2	Configuration Management Program
4.0	Procurement Document Control	SO123-XV-44	10 CFR 50.59 and 72.48 Program
		SO123-XI-7	Quality Affecting Procurement Document Development
5.0	Instructions, Procedures and Drawings	SO123-XXXII-2.1	Procurement Engineering
		SO123-XV-109	Procedure and Instruction Format and Content
		SO123-XV-HU-3	Human Performance Program

Appendix H: DQAP Implementing Programs/Procedures (cont.)

DQAP Section	QA Criterion Title	Implementing Programs and Procedures	
6.0	Document Control	SO123-VI-29	Corporate Documentation Management (CDM-SONGS) Record Process Management
		SO123-VI-28	Records Management Control of Nuclear Organization Manuals and Revision Controlled Document Preparation, Transmittal, and Processing
7.0	Control of Purchased Material, Equipment and Services	SO123-MS-1	Material Support Program
		SO123-XI-8	Supplier Evaluation and Qualification
		SO123-XII-18.19	Supplier Audits
		SO123-XII-20.4	Receiving Inspection
8.0	Identification and Control of Material, Parts and Components	SO123-XI-3.2	Storage of Quality-Affecting Items
		SO123-XII-18.19	Supplier Audits
9.0	Control of Special Processes	SO123-MA-1	Maintenance Division
		SO123-MA-1	Maintenance Division
10.0	Control of Inspection	SO13-XII-10.22	Nuclear Oversight Planning and Inspection
		SO23-XX-37	Work Management Process
11.0	Test Control	SO123-TS-1	Technical Specification/LCS Administrative Controls (Section 5) Program
		SO123-TS-2	Technical Specification Licensee Controlled Specification Surveillance Requirements
		SO123-CL-1	Calibration Program
12.0	Control of Measuring and Test Equipment	SO123-VII-20	Radiation Protection Program
		SO123-MT-1	Measuring And Test Equipment Program
		SO123-XI-3.2	Storage of Quality-Affecting Items
13.0	Handling, Storage and Shipping	SO123-XI-3.3	Packaging and Preservation Requirements for Storage and Shipment of Quality Affecting Items
		SO123-XII-20.4	Receiving Inspection
14.0	Inspection, Test and Operating Status	SO123-XX-5	Work Authorization and Tagging
		SO123-XV-50	Corrective Action Program
15.0	Nonconforming Materials, Parts and Components	SO123-XV-5	Nonconforming Material, Parts or Components
		SO123-XV-50	Corrective Action Program
16.0	Corrective Action	SO123-XV-50	Corrective Action Program
17.0	Quality Assurance Records	SO123-VI-29	Corporate Documentation Management (CDM-SONGS) Record Process Management
		SO123-VI-28	Records Management Control of Nuclear Organization Manuals and Revision Controlled Document Preparation, Transmittal, and Processing
		SO123-XV-77	SONGS Process Software Quality Assurance

Appendix H: DQAP Implementing Programs/Procedures (cont.)

DQAP Section	QA Criterion Title	Implementing Programs and Procedures	
18.0	Audits	SO123-XII-18.1	Audit Program
		SO123-XII-1.3	Authorities And Duties of Nuclear Oversight Personnel