



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 E. LAMAR BLVD.
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July 8, 2016

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 – NRC INSPECTION
REPORT 050-00361/2016-003; 050-00362/2016-003 AND 050-00206/2016-001**

Dear Mr. Palmisano:

This letter refers to the U.S. Nuclear Regulatory Commission (NRC) inspection conducted on June 6-9, 2016, at the San Onofre Nuclear Generating Station, Units 1, 2 and 3. The NRC inspector discussed the results of this inspection with you initially and then with other members of your staff at the final exit meeting on June 9, 2016. The inspection results are documented in the enclosure to this inspection report.

The NRC inspection examined activities conducted under your license as they relate to safety and 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 activities, and interviews with personnel. Specifically, the inspector reviewed the decommissioning activities of Units 2 and 3 involving the transition to "cold and dark" plant status, spent fuel safety, personnel exposure monitoring, and the material survey activities performed in the Unit 1 north industrial area in support of the construction of the dry cask storage expansion facility. No violations were identified and no response to this letter is required.

In accordance with 10 CFR 2.390, "Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access

T. Palmisano

- 2 -

and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Jack E. Whitten, Chief
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

Docket Nos. 50-361; 50-362; 50-206
License Nos. NPF-10; NPF-15; DPR-13

Enclosure:
Inspection Report 050-00361/2016-003;
050-00362/2016-003; 050-00206/2016-001
w/Attachment: Supplemental Information

U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket Nos. 050-00361; 050-00362; 050-00206
License Nos. NPF-10; NPF-15; DPR-13
Report Nos. 050-00361/2016-003; 050-00362/2016-003; 050-00206/2016-001
Licensee: Southern California Edison Company
Facility: San Onofre Nuclear Generating Station, Units 1, 2 and 3
Location: 5000 South Pacific Coast Highway, San Clemente, California
Dates: June 6 through June 9, 2016
Inspector: Rachel S. Browder, C.H.P., Senior Health Physicist
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety
Approved By: Jack E. Whitten, Chief
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

EXECUTIVE SUMMARY

NRC Inspection Reports 050-00361/2016-003; 050-00362/2016-003 and 050-00206/2016-001
Southern California Edison

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 (SONGS) Units 2 and 3, and the material contamination survey activities conducted at the Unit 1 site in support of the construction of the expansion of the dry cask storage facility. In summary, the licensee was conducting these activities in accordance with site procedures, license requirements, and applicable NRC regulations.

Decommissioning Performance

- The licensee continued to implement the cold and dark plant modifications in accordance with the Post-Shutdown Decommissioning Activities Report (PSDAR). The licensee was turning equipment over to operations in a methodical process and in accordance with procedures. Workers followed work plans, surveillance procedures, and industrial safety protocols and were aware of the job controls specified in work instructions. The inspector performed site tours within the radiologically restricted areas and concluded that the licensee was maintaining the areas in accordance with radiation protection procedures and regulatory requirements. (Section 1.2)

Spent Fuel Pool Safety

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

Occupational Radiation Exposure

- The licensee's personnel exposure monitoring and the As Low As Reasonably Achievable (ALARA) program were being conducted in accordance with appropriate regulatory requirements. (Section 3.2)

Control of Radioactive Materials and Contamination, Surveys, and Monitoring

- The inspector determined that the licensee had established survey plans, developed procedures for the soil excavation activities, and subsequently implemented the necessary surveys and monitoring to ensure that radioactive materials were measured and controlled in accordance with regulatory requirements. (Section 4.2)

REPORT DETAILS

Site Status

On June 12, 2013, Southern California Edison (SCE), the licensee, formally notified the NRC by letter that it had permanently ceased power operations at Units 2 and 3, effective June 7, 2013, (ML131640201). By letters dated June 28, 2013, (ML13183A391) and July 22, 2013, (ML13204A304) the licensee informed the NRC that the reactor fuel had been permanently removed from Units 3 and 2, respectively. The licensee submitted its PSDAR on September 23, 2014, (ML14269A033). In response to the licensee's amendment request, the NRC issued the Permanently Defueled Technical Specifications on July 17, 2015, (ML15139A390) along with revised facility operating licenses to reflect the permanent cessation of operations at SONGS Units 2 and 3.

On March 11, 2016, (ML16055A522) the NRC issued two revised facility operating licenses for SONGS Units 2 and 3, in response to the licensee's amendment request dated August 20, 2015, (ML15236A018). The license amendment allowed for 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 resulting from the elapsed time since the permanent shutdown of the units in 2012. The revisions support design basis changes made by the licensee associated with implementing the "cold and dark" plant status described in the PSDAR.

Current work in progress included final installation of the 12-kilovolt, non-safety and seismic Category III, electrical ring bus and associated equipment that will facilitate decommissioning of various plant systems. The licensee was draining the component cooling water system. The licensee's personnel exposure monitoring and ALARA program were being conducted in accordance with appropriate regulatory requirements. The licensee was safely storing spent fuel in wet storage. Excavation and construction activities in Unit 1 north industrial area were ongoing in support of the expansion of the independent spent fuel storage installation.

1 Decommissioning Performance (71801)

1.1 Inspection Scope

The inspector evaluated whether the licensee and its contracted workforce were conducting decommissioning activities in accordance with license and regulatory requirements.

1.2 Observations and Findings

Several tours of the facility were performed during the inspection period, which included the radiologically controlled area, fuel storage building, turbine building and the auxiliary building. Housekeeping and facility conditions were observed to be effectively controlled and continued to be satisfactory during the decommissioning activities reviewed as part of the inspection. The inspector observed that the contractor oversight staff performed field observations of work practices involving the cold and dark plant modifications. During the daily morning meetings, the contractor summarized the observations of the work force and recognized good work practices, such as the installation of the 500-kilowatt diesel generator and the performance of dead-live-dead tests prior to implementing plant modifications.

The priority work included final installation of the 12-kilovolt, non-safety and seismic Category III, electrical ring bus and associated equipment that will facilitate decommissioning of various plant systems. The remaining equipment to be connected included the security distribution, operations command center, telecommunications, heating/ventilation/air conditioning, fire detection systems, and spent fuel makeup. The spent fuel cooling system had been connected to the new 12-kilovolt system and was operational. The licensee anticipated completing the remaining cold and dark electrical modifications by the end of June 2016.

The licensee has worked extensively to provide stand-alone cooling for the site. This included a dedicated chiller for the new switchgear room on the 37 foot elevation, a new chiller for the 70 foot elevation to support the radwaste building, and at the time of this inspection the licensee was working to install a dedicated 100-ton chiller for the operations command center.

On March 11, 2016, the NRC approved license amendment request that allows the licensee to revise its UFSAR to reflect the significant reduction of decay heat loads in the SONGS Units 2 and 3 spent fuel pools resulting from the time that has elapsed since the permanent shutdown of the units in 2012. The revisions support design basis changes associated with implementing the cold and dark plant modifications as described in the PSDAR. The spent fuel island and cooling system was working sufficiently. On June 6, 2016, the licensee was no longer relying on the component cooling water as backup and initiated plans to drain the system. The licensee indicated that it would take approximately 19 days to drain the system based on the required dilution flow rates to ensure the liquid release met the California discharge permit requirements for copper.

The licensee had installed one backup diesel generator (1500-kilowatt) to the ring bus and was continuing to install the second backup diesel generator (500-kilowatt). These two diesel generators will provide power to critical cold and dark equipment and electrical panels during loss of power events. On May 5, 2016, the 1500-kilowatt diesel generator was partially turned over to operations for functional testing. The inspector verified that the necessary elements were in place to ensure the licensee had implemented a systematic approach to training, including the availability of necessary equipment, the establishment of appropriate procedures, and the provision of sufficient training to operations personnel. The licensee had developed procedure SO23-2-13.2, "SDG01, 1500kW Diesel Operation," Revision 1, for energizing the diesel generator as well as testing the diesel generator. The procedure provided a step-by-step sequence for starting and securing the diesel generator. Operations personnel had received training on the new system that included a video of the operation of the diesel generator. The inspector determined that operations personnel could operate the diesel generator, if needed, based on a series of interviews conducted with licensed and equipment operators, the training that the licensee provided to staff, and the experience and knowledge of the licensed and equipment operators.

The licensee initiated nuclear notification NN-203333953 to determine the load test frequency for both diesel generators and to contract a vendor to perform the routine preventative and corrective maintenance for both diesel generators. The licensee proposed that the vendor would perform 18-month load tests and operations would perform quarterly no-load tests on the 1500-kilowatt diesel generator. In addition, the vendor would perform annual routine maintenance on the 1500-kilowatt diesel generator.

The inspector toured areas of the plant and observed the progress and status of the various cold and dark plant modification projects. The inspector noted that the licensee's contractor was conducting work with an emphasis on industrial safety.

The inspector attended the plan of the day meetings and the contractor morning meetings. In addition, the inspector observed the Management Review Committee on Thursday, June 9, 2016, during which management had the opportunity to review recent nuclear notifications, challenge and provide comments to the proposed significance level, and discuss actions taken or proposed, as well as expected outcomes. The management team and contractor representatives were knowledgeable of the cases being reviewed and provided substantive comments and recommendations.

1.3 Conclusion

The licensee continued to implement the cold and dark plant modifications in accordance with the PSDAR. The licensee was turning equipment over to operations in a methodical process and in accordance with procedures. Workers followed work plans, surveillance procedures, and industrial safety protocols and were aware of the job controls specified in work instructions. The inspector conducted site tours within the radiologically restricted areas and concluded that the licensee was maintaining the areas in accordance with radiation protection procedures and regulatory requirements.

2 Spent Fuel Pool Safety (60801)

2.1 Inspection Scope

The inspector conducted a review of the spent fuel pools for SONGS Units 2 and 3, specifically the pool water level, chemistry, and associated cooling systems to ensure that the licensee was maintaining the two pools in accordance with technical specifications and procedural requirements.

2.2 Observations and Findings

Technical Specifications 3.1.1 and 3.1.2 requires the spent fuel pool water level be maintained greater than or equal to 23 feet over the top of the irradiated fuel assemblies seated in storage racks, and the spent fuel pool boron concentration be maintained greater than or equal to 2000 parts per million (ppm), respectively. In addition, SONGS UFSAR, Section 9.1.2.3, Safety Evaluation requires the spent fuel pool coolant temperature be maintained between 50°Fahrenheit (°F) to 160°F.

At the time of the inspection, both pools were greater than 23 feet over the top of the irradiated fuel assemblies. The SONGS Unit 2 spent fuel pool was at 28.2 feet and Unit 3 spent fuel pool was at 26.9 feet. The boron concentration ranged between 2797 and 2799 ppm for Unit 2 and 2771 and 2783 ppm for Unit 3. The data was collected on a 7-day surveillance as required by Technical Specification 3.1.1.1 and 3.1.2.1, respectively. The water level and boron concentration did not exceed the technical specification requirements.

The licensee indicated that the new spent fuel pool cooling system was holding the temperature of the spent fuel pools in steady temperature conditions. The Unit 2 spent fuel pool was 71.9°F and Unit 3 was 69.3°F, which was in the range specified in the UFSAR.

The inspector conducted a tour of the two SONGS spent fuel pools, and observed the monthly, water chemistry collection for boron, gamma isotopic activity, and chlorides, fluorides, and sulfates from the new spent fuel pool cooling system sink. The sample was collected in accordance with licensee procedure SO123-III-1.2.23, "Chemistry Procedure," Revision 22. The chemistry technicians followed good health physics practices as they performed alignment from the spent fuel pool cooling system ion exchanger outlet to the sample sink and collected the respective sample. The inspector noted that the area dose rate around the sample sink was at background levels, based on the licensee's instrumentation (Eberline R0-2 ion chamber, serial number 2485, calibration due date September 9, 2016). The results of the analyses indicated that all parameters were within procedural and technical specification limits.

The area around the spent fuel pool was posted as a foreign material exclusion area. A raised walkway had been installed around the backside of the SONGS Unit 2 spent fuel pool which aided in the traverse to the new spent fuel pool cooling island. The licensee was in the process of installing a similar walkway around the backside of the SONGS

Unit 3 spent fuel pool. The inspector noted that housekeeping in the building was satisfactory.

2.3 Conclusion

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

3 **Occupational Radiation Exposure (83750)**

3.1 Inspection Scope

The inspector reviewed the licensee's personnel exposure monitoring program to ensure it complies with Title 10 *Code of Federal Regulations* (CFR) Part 20.

3.2 Observations and Findings

The inspector reviewed the individual exposure records summary for calendar year 2015. The individual monitoring exposure records are required to be reported to the NRC on or before April 30th of each year, in accordance with 10 CFR 20.2206. The licensee submitted its personnel exposure records to the NRC's Radiation Exposure Information and Reporting System (REIRS) on March 31, 2016, for SONGS Units 2 and 3. The licensee did not monitor any individuals under the Unit 1 license, so no data were submitted for Unit 1.

Oakridge Associated Universities (ORAU) is responsible for maintaining the NRC's REIRS database for all NRC licensees and certain Agreement State licensees. The ORAU staff produces the NRC annual report on radiation exposure in the United States under NUREG-0713, "Occupational Radiation Exposure at Commercial Nuclear Power Reactors and Other Facilities."

The ORAU organization provided the licensee a memo dated April 4, 2016, that summarized the data that was submitted to REIRS, as part of the ORAU's data verification process. The licensee indicated that the data was verified correct.

The licensee monitored a total of 870 individuals during the calendar year 2015. There were 734 individuals with no measurable exposure. A total of 136 individuals received exposure and the largest individual exposure was approximately 35 millirem (mrem). The total occupational radiation exposure under the license was 1.202 rem.

The licensee issued dosimetry on an annual frequency to those individuals who are monitored for personnel exposures. The dosimeter uses optically stimulated luminescence process, which is a non-destructive analysis method to determine the exposure result and which has no fading characteristics. The licensee indicated that they are considering a 6-month monitoring frequency since the exposures are low and close to background levels. The licensee anticipates that a 6-month exposure monitoring frequency would alleviate the number of investigations that they perform.

The investigations are performed when there is a significant difference between the respective daily electronic dosimeter and the final OSL dosimeter results.

Licensee procedure SO123-0XV-85, "SONGS Station ALARA Committee," Revision 6 was reviewed. The procedure addresses the actions and responsibilities of the ALARA Committee, the membership of the committee, the frequency of meetings, and the quorum necessary to hold a committee meeting. The procedure provides the types of radiologically risk significant work activities that are reviewed by the ALARA committee. The most recent examples included the spent fuel assembly sipping activities in SONGS Unit 2 and Unit 3, which were reviewed as part of this inspection.

The inspector reviewed the following ALARA Committee meeting minutes:

- October 28, 2015,
- December 15, 2015
- January 14, 2016
- March 17, 2016
- May 25, 2016

The ALARA committee met several times to revise the dose estimates for the spent fuel assembly sipping operations, as well as to perform a mid-point review of the work and estimated exposures. The initial exposure goal for the fuel sipping activity was based on historical data from previous spent fuel assembly inspections, worker tasks, dose rates, and planned installed shielding.

Initially the combined dose goal for SONGS Unit 2 and Unit 3 was 130 person-mrem. The dose goal was revised based on the increased number of filters from the stand-alone underwater filtration system that was used and longer stay-times of personnel on the refueling bridge. The stay time on the refueling bridge was approximately 3 hours, which correlated to approximately 0.5 mrem. The licensee's dose tracking system rounded the 0.5 mrem to 1 mrem. Alternatively, when the dose was 0.4 mrem or less, the system rounded the value to 0 mrem. As a result of slight differences in the spent fuel pool activity in SONGS Unit 2 versus Unit 3, there was a corresponding difference in the exposure outcome for the fuel sipping operations in each unit. The licensee modified the dose goal for SONGS Unit 2 to reflect 420 mrem and subsequently increased the dose goal to 510 mrem. The licensee modified the dose goal for SONGS Unit 3 to 480 mrem based on Unit 2 activities. However, at the mid-point review, the ALARA Committee reduced the dose goal to 175 mrem based primarily on the lower activity in the SONGS Unit 3 spent fuel pool.

When the licensee expanded the SONGS spent fuel assembly sipping operations, the ALARA Committee re-evaluated the dose goals. Unit 2 expanded the spent fuel assembly sipping scope to include an additional 370 spent fuel assemblies and the dose goal was increased to 590 mrem, which was approved by the ALARA Committee during the meeting on May 25, 2016. The fuel sipping scope in Unit 3 was expanded to include an additional 320 fuel assemblies. The ALARA Committee reduced the dose goal for

SONGS Unit 3 to 162 mrem, because the licensee had only incurred 96 mrem thus far and 13 mrem was also subtracted from the total because of other reductions.

The final dose calculated for SONGS Unit 3 was 167 mrem, primarily from generating six additional underwater filters than anticipated. The licensee was transitioning the spent fuel assembly sipping operations to SONGS Unit 2 in order to complete the expanded scope of 370 fuel assemblies. The final dose for Unit 2 spent fuel assembly sipping operations was not completed at the time of the inspection.

Although the original dose goals were under-estimated, the licensee followed its ALARA committee procedure and generated a nuclear notification NN-203298578 to address the discrepancy and assess the processes used in order to prevent exceeding future goals. Management was engaged and attentive to the work activities, dose goals and ALARA, and openly provided suggestions as reflected in the meeting minutes, which indicated a good questioning attitude, discussion of options, and resolutions. Some examples of management engagement included increasing the frequency of surveys, obtaining different sticky pads, and incorporating a different methodology for handling filter change-outs. Overall, the site reduced exposures where possible, conducted reviews to determine effectiveness of dose goals, challenged the planning of dose goals, and provided necessary support to accomplish the tasks with exposures ALARA.

The licensee generated over 100 filters from the stand-alone underwater filtration system in support of the spent fuel assembly operations. The filter's activity was analyzed by an offsite laboratory for 10 CFR Part 61 analyses. Based on the analyses received at the time of the inspection, the aggregation of filter activity did not meet 10 CFR Part 37 requirements for Category 2 quantity of radioactive materials.

Historically, the licensee has established dose goals for each division and specific project dose goals, such as the fuel sipping operations. During the ALARA Committee meeting on December 15, 2015, the licensee approved a change to where the division goals would feed into one station goal. In that manner, all divisions would share in the station's dose goal. The station's dose goal for 2016, is 50 mrem, which is comprised primarily of operations and radiation protection dose goals. The dose remaining for calendar year 2015 is 24 mrem.

3.3 Conclusion

The licensee's personnel exposure monitoring and ALARA program were being conducted in accordance with appropriate regulatory requirements.

4 **Control of Radioactive Materials and Contamination, Surveys, and Monitoring (83726)**

4.1 Inspection Scope

The inspector reviewed the licensee's controls for radioactive materials and contamination, and its performance of surveys and monitoring of radioactive materials.

4.2 Observations and Findings

The licensee was constructing a new independent spent fuel storage installation (ISFSI) pad in the north industrial area. This area includes the footprint of the former SONGS Unit 1 plant that was decommissioned in 1999-2009. The licensee developed procedures to implement radiological controls in the event any radioactivity was encountered during the soil excavation work. The procedures provide instructions for worker protection under four scenarios: 1) no licensed material identified; 2) radioactive material identified by soil sampling but not gamma scans; 3) radioactive material identified by both soil sampling and gamma scans; and 4) hydrogen-3 (tritium) identified in groundwater, if shallow groundwater was encountered during excavation work. In addition, the licensee developed basic radiological controls, including training of workers, surveys of the work area, and posting of the work area, which are independent of the various worker protection controls developed for each scenario.

The licensee excavated soil to 12 feet below the ground surface in support of the construction. The licensee identified low levels of cesium-137 between -6 and -12 feet below the ground surface. The licensee successfully implemented its procedures for establishing radiological controls in the event any radioactivity was encountered. The licensee developed a sample plan to quantify the extent of contaminated soil.

The contaminated soil ranged from 0.1 to 0.3 picoCuries per gram (pCi/g) of cesium-137. It's noted that NUREG-1757, "Consolidated Decommissioning Guidance," Volume 1, Revision 2 provides screening values of common radionuclides for soil surface contamination levels in Appendix B. Specifically, the documented value for cesium-137 is 11.0 pCi/g, which represents the surface soil concentration that would be deemed in compliance with 25 mrem/year unrestricted release dose limit in 10 CFR 20.1402.

The licensee analyzed the soil samples collected using its count room located in the north industrial area. The germanium detector calibration was performed in accordance with licensee procedure SO123-III-4.5.6, "SONGS Gamma Spectroscopy Systems Setup and Maintenance," Revision 2. The licensee performed daily quality control checks on the system as required by procedure SO123-III-4.5.5, "Operation of the Alpha Gamma Spectroscopy Systems," Revision 4. The excavated soil was temporarily relocated to the reservoir area. The inspector observed the stockpiled soil, which had a covering that was held in place with sand bags. The licensee explained that the contaminated soil would subsequently be used as the base material to construct the ISFSI ramp, with the clean soil placed on top of the base material.

The licensee provided generic radiation worker training that was developed by Holtec to individuals working in the north industrial area in support of the ISFSI expansion project. In addition, a restricted area handout was provided to individuals who were escorted in the north industrial area. The level of training information provided was commensurate with the activities being conducted in the area and as such meets the requirements under 10 CFR Part 19, "Notices, Instructions and Reports to Workers, Inspection and Investigations." The licensee tracked the training provided in its training history database for each individual.

4.3 Conclusions

The inspector determined that the licensee had established survey plans, developed procedures for the soil excavation activities, and subsequently implemented the necessary surveys and monitoring to ensure that radioactive materials were measured and controlled in accordance with regulatory requirements.

5 Exit Meeting Summary

On June 9, the NRC inspector presented the inspection results to SCE management and staff. There was no proprietary information provided to the inspector.

SUPPLEMENTAL INSPECTION INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

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G.Lemon, Project Manager
S.Vaughan, Project Manager
V.Barone, Project Manager, Engineering
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C.Ahola, Radiation Protection Manager
G.Fausett, Holtec RP
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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 reasonably achievable
CFR	<i>Code of Federal Regulations</i>
ISFSI	Independent Spent Fuel Storage Installation
mrem	millirem
NRC	Nuclear Regulatory Commission
ORAU	Oakridge Associated Universities
OSL	optically stimulated luminescence
pCi/gm	picoCuries/gram
PSDAR	Post-Shutdown Decommissioning Activities Report
REIRS	Radiation Exposure Information and Reporting System
SONGS	San Onofre Nuclear Generating Station
TS	Technical Specifications
UFSAR	Updated Final Safety Analysis Report

T. Palmisano

- 2 -

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Sincerely,

/RA/

Jack E. Whitten, Chief
Fuel Cycle and Decommissioning Branch
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ADAMS ACCESSION NUMBER: ML16190A400

<input checked="" type="checkbox"/> SUNSI Review By: RSB	ADAMS: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Sensitive <input checked="" type="checkbox"/> Non-Sensitive	<input type="checkbox"/> Non-Publicly Available <input checked="" type="checkbox"/> Publicly Available	Keyword
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Letter to Thomas J. Palmisano from Jack Whitten dated July 8, 2016

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REPORTS 05000361/2016001; 05000362/2016001 AND 07200041/2016001

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