



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION IV  
1600 E. LAMAR BLVD.  
ARLINGTON, TX 76011-4511

December 13, 2017

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 05000361/2017-007 AND 05000362/2017-007**

Dear Mr. Palmisano:

This letter refers to the U.S. Nuclear Regulatory Commission (NRC) inspection conducted on November 13 - 16, 2017, at the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. The NRC inspectors discussed the results of this inspection with you and other members of your staff during an onsite final exit meeting conducted on November 16, 2017. 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 activities, and interviews with personnel. Specifically, the inspectors reviewed the decommissioning activities of SONGS Units 2 and 3 involving the transition of programs to SONGS Decommissioning Solutions (SDS) as the decommissioning general contractor, synchronous condenser activities, spent fuel safety, maintenance rule program, and the corrective action program. No violations were identified and no response to this letter is 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.

T. Palmisano

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If you have any questions regarding this inspection report, please contact Rachel Browder at 817-200-1452, or the undersigned at 817-200-1191.

Sincerely,

*/RA/*

Ray L. Kellar, P.E., Chief  
Fuel Cycle and Decommissioning Branch  
Division of Nuclear Materials Safety

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

Enclosure:  
Inspection Report 05000361/2017-007;  
05000362/2017-007  
w/Attachment: Supplemental Information

**U.S. NUCLEAR REGULATORY COMMISSION**

**REGION IV**

Docket Nos. 05000361; 05000362

License Nos. NPF-10; NPF-15

Report Nos. 05000361/2017-007; 05000362/2017-007

Licensee: Southern California Edison Company

Facility: San Onofre Nuclear Generating Station, Units 2 and 3

Location: 5000 South Pacific Coast Highway, San Clemente, California

Dates: November 13 - 16, 2017

Inspectors: Rachel S. Browder, CHP, Senior Health Physicist  
Fuel Cycle and Decommissioning Branch  
Division of Nuclear Materials Safety

Stephanie G. Anderson, Health Physicist  
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Approved By: Ray L. Kellar, P.E., Chief  
Fuel Cycle and Decommissioning Branch  
Division of Nuclear Materials Safety

Enclosure

## EXECUTIVE SUMMARY

San Onofre Nuclear Generating Station, Units 2 and 3  
NRC Inspection Report 05000361/2017-007; 05000362/2017-007

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. In summary, the licensee was conducting these activities in accordance with site procedures, license requirements, and applicable NRC regulations.

### Decommissioning Performance and Status Review at Permanently Shutdown Reactors

- The licensee was adequately maintaining the material condition of the facilities and general housekeeping was satisfactory. The licensee's survey results and soil sample analyses of the southern portion of the switchyard indicated the area was indistinguishable from background radiological levels and therefore met the unrestricted use criteria established under 10 CFR 20.1402. (Section 1.2)

### Spent Fuel Pool Safety at Permanently Shutdown Reactors

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

### Organization, Management, and Cost Controls at Permanently Shutdown Reactors

- The licensee and SONGS Decommissioning Solutions (SDS) had established a robust transition plan as programs were handed-over to SDS. The licensee was maintaining its oversight of the contractor's programs to ensure that activities were being conducted in accordance with the applicable regulatory requirements and license conditions. Based on the programs reviewed, the licensee had successfully transitioned the programs and SDS was implementing the programs to meet the applicable regulatory requirements and license conditions. (Section 3.2)

### Maintenance and Surveillance at Permanently Shutdown Reactors

- The maintenance rule program had been successfully transitioned to SDS. The licensee had appropriately implemented the maintenance rule to ensure compliance with the requirements of 10 CFR 50.65 for structures, systems, and components associated with the storage, control, and maintenance of spent fuel, or which were used in plant emergency operating procedures. (Section 4.2)

### Self-Assessment, Auditing and Corrective Action at Permanently Shutdown Reactors

- The licensee had established audit, review, and oversight programs to ensure that activities were being conducted in accordance with the applicable regulatory requirements, license conditions, and Decommissioning Quality Assurance Program (DQAP) procedures. The licensee and SDS had identified issues at the appropriate thresholds and entered them into their respective corrective action programs (CAP) systems. Issues were screened and prioritized commensurate

with safety significance. The licensee and SDS evaluations determined the significance of issues and included appropriate remedial corrective actions. (Section 5.2)

#### Adverse Weather Protection

- The licensee had initiated its adverse weather preparations in accordance with applicable regulatory and license requirements. (Section 6.2)

## Report Details

### Summary of Plant 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 SONGS Units 2 and 3, effective June 7, 2013. The document 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, respectively. 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 two-years following permanent cessation of operations under 10 CFR 50.82(a)(4). 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.

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 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 SFPs 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 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 4, 2015, (ADAMS Accession No. ML15082A204). The licensee submitted a license amendment request dated December 15, 2016, (ADAMS Accession No. ML16355A015) to revise the Permanently Defueled Emergency Plan into an Independent Spent Fuel Storage Installation (ISFSI)-Only Emergency Plan, and to revise the Emergency Action Level (EAL) scheme into an 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, an activity which is currently scheduled for completion in 2019. The NRC issued amendments to the SONGS Operating Licenses to allow transition to an ISFSI-Only Emergency Plan and EAL scheme on November 30, 2017 (ADAMS Accession No. ML17310B482).

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 will be known as SONGS Decommissioning Solutions (SDS). The SDS organization will manage 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. Based on the Commission’s website, it anticipates releasing the Draft Environmental Impact Report in the first or second quarter of 2018.

During the inspection, the spent fuel was being safely stored in the two SFPs. The San Diego Gas and Electric synchronous condenser was being constructed in the southern portion of the switchyard. The licensee had transferred 19 of the 21 programs to the SDS decommissioning general contractor. The SDS organization had initiated planning for the site’s decommissioning activities, which will commence once the spent fuel has been moved to the new ISFSI expansion and the licensee has received the required permit from the CSLC.

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

### **1.1 Inspection Scope**

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

### **1.2 Observations and Findings**

The inspectors performed tours of the facilities, including the spent fuel handling buildings, command center, and the general areas along the west and east roads. The SDS organization was in the initial planning stages for decommissioning of the SONGS Unit 2 and 3 facilities, and the inspectors had an opportunity to enter the Unit 2 containment building. Based on observations, the inspectors determined that the licensee was adequately maintaining the material condition of the facilities, as well as the condition of systems, structures, and components that supported spent fuel safety. The inspectors assessed area radiological conditions and the associated posting and labeling, and determined that the licensee was appropriately implementing the regulatory requirements under 10 CFR Part 20.

The activities in the southern portion of the switchyard continued with the construction of the building that will house the San Diego Gas and Electric synchronous condenser. The licensee continued to perform radiological characterization surveys and collected NRC split soil samples in the construction area to serve as confirmatory measurements. The most recent results for composite soil samples analyzed by NRC’s contract laboratory, Oak Ridge Associated Universities are provided below. The samples were analyzed by gamma spectroscopy for the radionuclides of concern, which were cobalt-60 (Co-60) and cesium-137 (Cs-137).

Soil Sample	Sample Description	Results (pCi/g)		Collection Date	Report Date	ADAMS Accession No.
		Co-60	Cs-137			
1	Duct Bank Excavation 00001	< 0.043	< 0.036	August 30, 2017	October 18, 2017	ML17321B091
2	Duct Bank Excavation 00002	0.023	0.002	August 30, 2017	October 18, 2017	ML17321B091

The data collected will be used to supplement the final status surveys to support license termination at a later date. The licensee's survey and soil sample analysis results demonstrated that the excavated soils in the southern portion of the switchyard met the unrestricted use criteria established under 10 CFR 20.1402.

### 1.3 Conclusion

The licensee was adequately maintaining the material condition of the facilities and general housekeeping was satisfactory. The licensee's survey results and soil sample analyses of the southern portion of the switchyard indicated the area was indistinguishable from background radiological levels and therefore met the unrestricted use criteria established under 10 CFR 20.1402.

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

### 2.1 Inspection Scope

The inspectors conducted a review of the SONGS Units 2 and 3 spent fuel pool (SFP) operations to ensure that the licensee was maintaining the 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 SFP 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 SFP boron concentration be maintained greater than or equal to 2,000 parts per million (ppm), respectively. In addition, SONGS UFSAR, Section 9.1.2.3, Safety Evaluation requires the SFP coolant temperature be maintained between 50°Fahrenheit (°F) and 160°F.

The SONGS Units 2 and 3 SFPs were being maintained at approximately 27 feet, 7 inches, above the top of the irradiated fuel assemblies, based on the command center data acquisition system (CDAS) trending. The SFP cooling systems were holding temperatures steady at approximately 68°F - 71°F in each unit, which was within the (50°F – 160°F) range specified in the UFSAR. The licensee was slowly increasing the temperature in the Unit 3 SFP to above 71°F in preparation for fuel movement. The boron parameter in the SFPs was required to be analyzed weekly to verify the boron concentration. The Unit 2 and Unit 3 SFP boron concentrations were being analyzed as required and maintained at approximately 2700 ppm. When the licensee added makeup water to both SFPs, the boron concentration was reduced for approximately one week; however, the concentration never went below the Technical Specification requirement of 2000 ppm. The inspectors determined that the licensee was adequately meeting the Technical Specification requirements for the Units 2 and 3 SFPs.

The NRC inspectors performed a walk-down of the Unit 2 SFP and the associated piping, pumps, and heat exchangers. The inspectors also observed the status of SFP radiation and foreign material exclusion boundaries, postings, and labeling to ensure compliance with regulatory and procedural requirements. The NRC inspectors conducted independent gamma radiation measurements using a Ludlum Model 2401-S survey meter



(NRC No. 079971, calibration due date of March 13, 2018). The results were consistent with the licensee’s survey data for the Unit 2 spent fuel handling building.

The inspectors observed the weekly chemistry sample collection from both of the SFPs. The licensee’s contractor followed procedure SDS-CH1-PCD-1001, “Chemical Control of Plant Systems and Consumable Materials Control of Restricted Systems,” Revision 1. The procedure implemented the Technical Specifications and license requirements for maintaining chemistry parameters for plant systems, including spent fuel safety. The inspectors observed the chemistry technician following good radiological work practices while collecting and handling the chemistry sample from the SFP.

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 **Organization, Management, and Cost Controls at Permanently Shutdown Reactors (36801)**

3.1 Inspection Scope

The inspectors reviewed the organization and overall structure of the licensee’s decommissioning general contractor known as SDS, including the transition and implementation of certain programs formerly controlled by SCE, staffing, qualifications, and training. In addition, the inspectors reviewed the licensee’s oversight program to ensure it was maintaining effective oversight of decommissioning activities.

3.2 Observations and Findings

The licensee and its decommissioning general contractor, SDS, had developed a systematic transition of 21 programs to the SDS organization. The licensee had transitioned four programs on July 27, and subsequently transitioned five additional programs each on August 31, September 28, and October 26, as scheduled below.

July 27	August 31	September 28	October 26	November 30
<b>Nuclear Safety Culture</b>	Occupational Safety	<b>Engineering</b>	Environmental	Security (SCE)
<b>Corrective Action Program</b>	Training	Work Control	Chemistry	Maintenance
<b>Nuclear Oversight</b>	Support Services	Operations (SCE)	Waste Management	
<b>Regulatory Affairs/ Licensing</b>	Utilities	<b>Business Systems</b>	Emergency Preparedness (SCE)	
	Site Facilities	Fire Protection	Radiation Protection	

The programs highlighted in Bold text indicate dual programs, which signifies that each company will maintain its own programs such that the licensee and SDS personnel will follow each company’s programs and procedures, nevertheless with adequate licensee interface to ensure continued regulatory compliance. In addition, the programs

highlighted with "(SCE)" after the program name indicate that the respective program will remain under the licensee's control and not transition to SDS.

The NRC inspectors reviewed several programs that had recently transitioned from the licensee to SDS. The programs reviewed included: 1) training, 2) radiation protection, 3) chemistry, and 4) work control. The licensee and SDS were continuing to work through several interfaces in transferring activities; however, the inspectors observed good communications and items were being tracked to ensure complete transition of activities.

The inspectors reviewed the SDS training program, procedures, and discussed the program with several staff personnel. The SDS Procedure SDS-TN1-PCD-000, "SDS Training Department Organization," Revision 1 described the organization, roles and responsibilities of the SDS training department. The procedure also described the interfacing relationship between the SDS training department and the licensee's oversight organization. Based on a review of the SDS training program and discussions with personnel, the inspectors concluded that SDS had implemented a program that met the "systematic approach to training" methodology. The SDS Procedure SDS-TN1-PCD-003, "Systematic Approach to Training Process," Revision 1, described the processes for this required methodology that was consistent with the requirements under 10 CFR 50.120, "Training and Qualification of Nuclear Power Plant Personnel." This SDS procedure included an analysis for the training need, a design for the training course that included terminal and enabling objectives, development and implementation methods for the specified training course, and evaluation and assessment of the training course. The inspectors did not observe any issues or complications regarding the transition of the training program to SDS.

The radiation protection and chemistry programs were transitioned to SDS on October 26, 2017. The inspectors reviewed the training records of several employees who had transferred from the licensee's training program to the SDS training program and concluded there was sufficient documentation to satisfy the qualification requirements for the employees. The inspectors reviewed radiation protection procedures, recently performed surveys, and interviewed several employees about the radiation protection and chemistry programs. In particular, the inspectors reviewed the documentation for the recent resin survey and movement from the fuel handling building to another location onsite. In addition, the inspectors observed the weekly SFP chemistry sample collection. The inspectors reviewed the As Low As is Reasonably Achievable (ALARA) Committee minutes for the meeting conducted by SDS on November 9, 2017. Based on these observations, the inspectors determined that SDS had developed radiological protection and chemistry programs consistent with regulatory and license requirements.

The work control program had also been recently transitioned to the SDS organization. The inspectors reviewed procedures, including the SDS Desktop Planning Guide, SDS-WC1-WIN-0001, "Work Control," Revision 0 and Procedure SDS-WC1-PGM-0001, "SDS Work Control Program," Revision 1. The SDS work control group was comprised of multiple disciplines, including civil, mechanical, and electrical. The inspectors reviewed one decommissioning work package (DWP) No. SDS-0-E-CO-001, that had been generated by SDS to pull three cables from the ring bus PME01 location to the north east exterior area of the 37 foot Radwaste Truck Bay. The work package had appropriate sign-offs for the field route for the cable pull, and adequately implemented the procedure requirements for SDS' work control plan.

The inspectors also observed the 6-week look ahead work control planning meeting. During the transition, there were some overlap in the assigned work orders. The inspectors observed good communications and a questioning attitude between the SCE and SDS staff members to ensure the tracking database was correctly updated to capture the required activity at the appropriate frequency. As noted above, the licensee and SDS were working through several interfaces in transferring activities. Based on the documents reviewed and interviews with licensee and SDS personnel, the inspectors concluded that the work control program was being adequately implemented.

### 3.3 Conclusions

The licensee and SDS had established a robust transition plan as programs were handed-over to SDS. The licensee was maintaining its oversight of the contractor's programs to ensure that activities were being conducted in accordance with the applicable regulatory requirements and license conditions. Based on the programs reviewed, the licensee had successfully transitioned the programs to SDS, and SDS had implemented the programs to meet the applicable regulatory requirements and license conditions.

## **4 Maintenance and Surveillance at Permanently Shutdown Reactors (62801)**

### 4.1 Inspection Scope

The inspectors reviewed the maintenance rule program relative to the safe storage, maintenance, and control of spent fuel to ascertain whether SDS effectively implemented the requirements under 10 CFR 50.65.

### 4.2 Observations and Findings

The licensee had implemented a Maintenance Rule program in accordance with 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," and with NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." The licensee performed its periodic assessment of the maintenance rule program as required by 10 CFR 50.65(a)(3) for the assessment period of July 2015 through June 2017. At the start of the assessment period, there were 26 plant systems in-scope, with a total of 56 monitored functions. At the conclusion of the assessment period, there were 15 plant systems in-scope with a total of 23 monitored functions. The inspectors reviewed the identified systems, structures, and components (SSCs) that were being monitored by the licensee. The inspectors determined that the licensee had identified and was monitoring the SSCs associated with spent fuel safety, or which were used in plant emergency operating procedures.

The licensee had three SSCs in goal setting under 10 CFR 50.65(a)(1) during the assessment period of July 2015 through June 2017. The SSCs included: 1) 120 Volt AC power, 2) Fire Protection Water System, and 3) Unit 3 Radiation Monitoring System. The inspectors reviewed the Maintenance Rule Expert Panel Meetings conducted on April 26, 2017, and September 13, 2017. During the April 26, 2017 meeting, the Radiation Monitoring System was placed into (a)(1) goal setting, primarily due to equipment aging. The meeting minutes from September 13, 2017, documented the return of the 120V system to monitoring. The fire protection water system had previously been transitioned

back to monitoring, so at the time of the inspection, the only SSC in (a)(1) goal setting was the Unit 3 Radiation Monitoring System. The inspectors reviewed the bases under which the licensee removed the other systems from (a)(1) goal setting. The inspectors concluded that the systems met the established performance criteria and it was reasonable to move them back into a monitoring mode.

The maintenance rule program transitioned from SCE to SDS as part of the Engineering transition on September 28, 2017. The inspectors reviewed the SDS procedures for the program, including Procedures SDS-EN2-PGM-0001, "SDS Maintenance Rule Program," Revision 1 and SDS-EN2-PCD-0001, "Maintenance Rule for Structures," Revision 1. The procedures adequately implemented the maintenance rule program in accordance with the regulatory requirements and consistent with the program previously implemented by SCE. Although SCE had utilized system engineers to monitor the SSCs under the program, since decommissioning, the inspectors concluded that it was reasonable for SDS to implement the maintenance rule program utilizing one qualified engineer.

#### 4.3 Conclusions

The maintenance rule program had been successfully transitioned to the SDS organization. The licensee appropriately implemented the maintenance rule to ensure compliance with the requirements of 10 CFR 50.65 for structures, systems, and components associated with the storage, control, and maintenance of spent fuel, or which were used in plant emergency operating procedures.

### **5 Self-Assessment, Auditing, and Corrective Action at Permanently Shutdown Reactors (40801)**

#### 5.1 Inspection Scope

The inspectors reviewed the licensee's and the SDS decommissioning contractor's policies and implementing procedures that govern the corrective action program to verify compliance with the applicable regulatory requirements and decommissioning documents.

#### 5.2 Observations and Findings

The licensee's and SDS' corrective action programs were dually implemented on July 27, 2017. The licensee's program description was implemented in Procedure SO123-XV-50, "Corrective Action Program," Revision 40 and the SDS program was implemented in Procedure SDS-RA1-PGM-0005, "SDS Corrective Action Program (CAP)", Revision 1.

The inspectors reviewed documents and interviewed plant personnel to assess the licensee's performance in implementation of the corrective action program. Each work group initiated corrective actions according to its respective authorized implementing program. The inspectors reviewed several condition reports that were generated under the SCE program and the SDS program, including the eight SFP action requests generated since the previous NRC inspection. The inspectors determined there was a sufficiently low threshold for problem identification within the various functional areas of the two programs and that items were entered into the respective corrective action

programs in a timely manner. The associated documentation adequately described the corrective actions and identified the significance of the issue. Based on the actions reviewed, the inspectors concluded that SCE and SDS correctly identified the significance of the issues.

The inspectors observed a Management Review Committee meeting conducted on November 16, 2017. Based on the observation of the meeting and review of the supporting documentation, the inspectors determined that the issues were effectively screened, prioritized, and evaluated commensurate with their safety significance. The inspectors concluded that the corrective action programs were being managed and implemented appropriately.

The licensee's nuclear oversight performed an assessment of the corrective action program from October 2, 2017, through October 12, 2017. The purpose of the assessment was to evaluate the implementation of the SDS corrective action program and to evaluate the adequacy of the licensee's oversight function. Overall, the licensee's nuclear oversight program documented that the SDS program was being implemented appropriately and in accordance with the applicable procedures and license requirements. In addition, the Decommissioning Agent Oversight organization was in the process of a CAP assessment (ASMT00002) which was scoped to evaluate the Post-Transition SDS CAP. The NRC will continue to review the implementation of the SDS CAP, as well as review this assessment report during a subsequent inspection.

### 5.3 Conclusions

The licensee had established audit, review, and oversight programs to ensure that activities were being conducted in accordance with the applicable regulatory requirements, license conditions, and Decommissioning Quality Assurance Program (DQAP) procedures. The licensee and SDS had identified issues at the appropriate thresholds and entered them into their respective CAP systems. Issues were screened and prioritized commensurate with safety significance. The licensee and SDS evaluations determined the significance of issues and included appropriate remedial corrective actions.

## **6 Adverse Weather Protection (71111.01)**

### 6.1 Inspection Scope

The inspectors evaluated the overall adequacy and implementation of the licensee's readiness for seasonal extreme weather conditions, which may impact safe storage of spent fuel, as well as the proper operation of radiation monitoring and effluent control equipment at the licensee's facility.

### 6.2 Observations and Findings

The inspectors discussed the preparations for adverse weather and lessons learned with several licensee staff members specifically regarding the actions taken by the licensee and SDS to ensure those systems important to decommissioning safety would not be impacted during seasonal extreme weather conditions, which was primarily wind and rain. In preparation for the 2017 seasonal extreme weather readiness, the licensee had

completed several actions necessary for weather preparations. The inspectors observed some of the required actions such as securing light-weight items, such as trashcans.

### 6.3 Conclusions

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

## **7 Exit Meeting Summary**

On November 16, 2017, the NRC inspectors presented the final inspection results to Mr. T. Palmisano, Vice President and Chief Nuclear Officer, and other members of the licensee's staff. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

## **SUPPLEMENTAL INSPECTION INFORMATION**

### **KEY POINTS OF CONTACT**

#### **Licensee Personnel**

A.Bates, Regulatory Affairs and Oversight Manager  
J.Davis Operations Manager  
S.Enright, Assistant Radiation Protection Manager  
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S.Mannon, Regulatory Affairs Manager, SDS  
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M.Reitzler, Work Control and Maintenance  
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### **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 36801 Organization and Management at Permanently Shutdown Reactors  
IP 40801 Self-Assessment, Auditing, and Corrective Action at Permanently Shutdown Reactors  
IP 62801 Maintenance and Surveillance 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  
CAP Corrective Action Program  
CDAS Command Center Data Acquisition System  
CFR *Code of Federal Regulations*  
CSLC California State Lands Commission  
DQAP Decommissioning Quality Assurance Plan  
EAL Emergency Action Level

NRC	Nuclear Regulatory Commission
PSDAR	Post-Shutdown Decommissioning Activities Report
SDS	SONGS Decommissioning Solutions
SCE	Southern California Edison
SFP	Spent Fuel Pool
SSC	Structure, System and Component
SONGS	San Onofre Nuclear Generating Station
TS	Technical Specifications
UFSAR	Updated Final Safety Analysis Report



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 05000361/2017-003; 05000362/2017-003 - DATED DECEMBER 13, 2017

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 Rosemead, CA 91770

ADAMS ACCESSION NUMBER: ML17345A924

<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 NRC-002	
OFFICE	DNMS/FCDB	FCDB	FCDB	NMSS/DUWP/RDB	C:FCDB
NAME	RSBrowder	SAnderson	LMGersey	MVaaler	RLKellar
SIGNATURE	/RA/	/RA/	/RA/	/RA/	/RA/
DATE	12/11/17	12/11/17	12/12/17	12/11/17	12/13/17

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