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May 1, 2018

10 CFR 50.54(a)

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

SUBJECT: **Docket Nos. 50-206, 50-361, 50-362 and 72-041
Proposed Revision to the Southern California Edison (SCE) San
Onofre Nuclear Generating Station Decommissioning Quality
Assurance Program (DQAP), San Onofre Nuclear Generating Station
(SONGS), Units 1, 2, 3, and ISFSI**

REFERENCES: 1. Letter from M. Khanna (NRC) to T. J. Palmisano (SCE), dated August 10, 2015, Subject: San Onofre Nuclear Generating Station, Units 1, 2, 3, and the ISFSI, Review of Changes to the Decommissioning Quality Assurance Program (DQAP), (ADAMS Accession No. ML15191A461)
2. Letter from T. J. Palmisano (SCE) to Document Control Desk (NRC) dated December 15, 2016; Subject; Docket Nos. 50-206, 50-361, and 50-362, Amendment Applications 225, 272, and 257, ISFSI-only Technical Specifications, San Onofre Units 1, 2, and 3 (ADAMS Accession No. ML16355A014)
3. Letter from M. G. Vaaler (NRC) to T. J. Palmisano (SCE) dated January 9, 2018; Subject: San Onofre Nuclear Generating Station, Units 1, 2, and 3, Issuance of Amendments to Change the Defueled Technical Specifications to Reflect Permanent Removal of Spent Fuel from the Spent Fuel Pools (ADAMS Accession No. ML17345A657)

Dear Sir or Madam

The purpose of this letter is to request a change to the San Onofre Nuclear Generating Station (SONGS) Decommissioning Quality Assurance Program (DQAP) in accordance with 10 CFR 50.54(a). Southern California Edison (SCE) has determined that the proposed changes constitute a reduction in commitment, and requests NRC review and approval of the proposed DQAP.

The proposed change involves the elimination of commitments to the previously approved Quality Assurance Program in various sections. By about December 31, 2018, all spent nuclear fuel assemblies are planned to be removed from the Spent Fuel Pool and transferred

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to the Independent Spent Fuel Storage Installation (ISFSI) at the SONGS site and all SSCs within the plant associated with spent fuel storage in the spent fuel pool will be eliminated.

With achieving this key milestone, the DQAP scope will transition to only be applicable to Important To Safety (ITS) SSCs and Type B radioactive material transportation packages shipped to an offsite disposal facility. These ITS SSCs are related to the safe storage of spent fuel at the ISFSI, which are categorized as ITS. Therefore, some current commitments defined in the DQAP will no longer be applicable or necessary based on the reduced risk. This guidance provided within the DQAP will continue to be utilized to satisfy the criteria of Appendix B to 10 CFR 50 and the Quality Assurance requirements of 10 CFR 71, Subpart H and 10 CFR 72, Subpart G.

The DQAP was initially approved by the NRC by letter dated August 10, 2015 (Reference 1) Revision 4 is the current revision utilized by the facility. Revision 5, which incorporated the Technical Specifications relocating the administrative requirements into the DQAP, was used to develop this proposed revision 6 (subject for your review) and has yet to be issued. Because the proposed change involves a significant reduction in commitments to the DQAP as reflected in Revision 5, SCE hereby requests NRC review and approval of the proposed change to the DQAP. Attachment 1 includes a summary of changes and an evaluation of the more significant and administrative changes. Attachment 2 provides proposed Revision 6 of the DQAP.

The proposed Revision 6 of the SONGS DQAP includes the relocated administrative Technical Specifications consistent with SCE's proposed ISFSI-only Technical Specifications (Reference 2), approved by the NRC on January 9, 2018 (Reference 3). As described in References 2 and 3, those Technical Specification changes will not be implemented until all spent nuclear fuel assemblies are transferred from the Spent Fuel Pool to the ISFSI, which is currently scheduled for December of 2018.

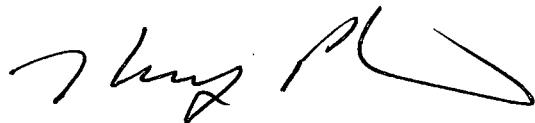
In accordance with 10 CFR 50.54(a)(4)(iv), SCE considers the changes as requested in this submittal and as proposed in Revision 6 to the DQAP as accepted by the NRC 60 days after this submittal to the NRC or upon receipt of a letter approving these changes. SCE intends to implement Revision 6 of the DQAP concurrent with the approved changes to the Technical Specifications following the transfer of all spent nuclear fuel assemblies to the ISFSI. Similar changes have been proposed and approved by the NRC for the Yankee Nuclear Power Station, Haddam Neck Plant, Humboldt Bay Power Plant, and Zion Nuclear Power Station.

There are no new regulatory commitments in this letter or the attachments.

If you have any questions or require additional information, please contact Mr. Albert Bates, at (949) 368-6945.

Executed on 51/12/2018

Sincerely,



Attachments:

1. Summary of the Proposed Changes to the SONGS DQAP Revision 6
2. SONGS DQAP Proposed Revision 6

cc: K. Kennedy, Regional Administrator, NRC Region IV
M. Vaaler, NRC Project Manager, SONGS Units 1, 2 and 3
S. Y. Hsu, California Department of Public Health, Radiologic Health Branch

ATTACHMENT 1

Summary of the Proposed Changes to the SONGS DQAP Revision 6

Attachment 1
DQAP Proposed Change Evaluation

10CFR50.54 (a) and 10CFR71.106 Evaluation for Decommissioning Quality Assurance Program (DQAP), Revision 6

Evaluation Scope

Changes are proposed to the DQAP in Revision 6 to reflect the completion of the transfer of all spent fuel from the Spent Fuel Pool to the Independent Spent Fuel Storage Installation (ISFSI) and to address the corresponding reduced nuclear safety risks. The changes are categorized into groupings, which are being evaluated. These two (2) groupings are those that were considered more substantial changes and those that were categorized as more minor administrative changes. The evaluation will determine if the changes fall into these three (3) specific categories:

- Reductions in commitments to the previously approved DQAP, which require prior NRC approval to implement.
- Reductions in commitments to the previously approved DQAP that were previously approved by the NRC for another nuclear facility, with an associated Safety Evaluation Report (SER) issued by the NRC that has a similar basis, which require prior NRC approval to implement.
- Administrative, editorial, clarification or formatting, which do not require prior NRC approval.

Although some changes do not specifically require prior NRC approval, the entire DQAP document is being submitted for approval since there are numerous changes that do require prior NRC approval to implement. None of the changes will be implemented without prior NRC approval.

Overall Evaluation Conclusion

The evaluation identified that a number of the changes are considered reductions in commitments to the previously approved DQAP, which require prior NRC approval to implement. Specifically, changes being made in all sections, along with some of the Appendices. Although many of these sections are being completely rewritten, the proposed language is similar to that which has been previously approved by the NRC for nuclear facilities that had completed the transfer of all of the spent nuclear fuel to an ISFSI, with only minor deletions, alterations and additions. The facilities that have had their Quality Assurance Programs approved with similar language include Connecticut Yankee Atomic Power Company (CYAPCO), Yankee Atomic Electric Company (YAEC) and Maine Yankee Atomic Power Company (MYAPCO). The NRC issued a Safety Evaluation Report (SER) for the change to the MYAPCO QAP; however, the approval basis is not fully consistent with that of SONGS since decommissioning had been completed at MYAPCO at the time of the approval. The SONGS regulatory basis of "all spent fuel transferred to an ISFSI" and program commitment to Regulatory Guide 7.10 will be consistent with each of these facilities at the time of implementation of the DQAP change.

This DQAP change will be implemented in conjunction with the NRC approved License Amendment Request (LAR) that reflects all of the spent fuel will have been transferred to the ISFSI and the elimination of the SSCs within the plant associated with spent fuel storage in the Spent Fuel Pool. The proposed language in the revision to the DQAP is similar to that of the Vermont Yankee Nuclear Power Station (VYNPS) Quality Assurance Program Manual (QAPM) that was submitted in 2017 to the NRC for approval to reflect the completion of the transfer of spent nuclear fuel to their ISFSI.

There are similar changes to the proposed revision that are considered reductions in commitments to the previously approved DQAP that have been approved by the NRC for another nuclear facility with an associated SER being issued for the approval. Since the basis for the NRC approval is not completely consistent with that of SONGS, these specific changes will require NRC approval prior to implementation. The remaining changes are administrative, editorial, clarification or formatting and do

not require prior NRC approval. Although there are numerous changes to the DQAP that require prior NRC approval to implement, the document continues to satisfy the requirements of 10CFR50 Appendix B, 10CFR71 Subpart H, and 10CFR72 Subpart G.

Details of the Evaluation

The groupings are provided below, along with the associated evaluations for each of the proposed changes (Change Group 1 and Change Group 2).

Change Group 1 – More Substantial Changes:

Change 1A: The application of the DQAP has transitioned to apply to only important to safety (ITS) structures, systems and components (SSCs) and associated activities. This change in applicability is considered a reduction in commitments to the previously approved DQAP. This change is supported by an associated SER for a revision to the VYNPS QAPM that was issued by the NRC documenting the approval of a similar change, having the same regulatory basis (Certification of Cessation of Power Operations), with one deviation. This change to the DQAP is similar to Vermont Yankee's NRC approval in which augmented quality is being removed from the program and will be controlled through the use of approved administrative controls. The contrast is the VYNPS still had SSCs classified as safety related due to spent fuel still being stored in their Spent Fuel Pool. Specifically, the changes were allowed based on the reduced risk of a permanently shut down facility. Reference Letter to Vermont Yankee from the NRC, dated June 16, 2016 (ADAMS Accession Nos. 16165A466 and 16165A467), which includes the associated SER. Although this change is similar to the Vermont Yankee approval, it will not be implemented without prior NRC approval since the designation of SCCs within the DQAP is not identical to that of the Vermont Yankee's SER approval basis.

Change 1B: The organizational discussion has been streamlined to provide more generic organizational position titles rather than being position specific. Some of the historical functions do not need to be included in the DQAP after fuel is transferred to the ISFSI and have been eliminated or consolidated. The Chief Nuclear Officer title has been replaced with the generic title of "executive officer." This position is the previously described corporate officer, which reflects the title from the relocated administrative Technical Specification, which is now included in Appendix D. This title has also been updated to executive officer to be consistent with the remainder of the DQAP. This modification is not a reduction in commitments since this type of change is administrative in nature and does not affect the independence of Nuclear Oversight, which continues to report to an executive officer for SCE and the overall responsible individual for nuclear safety remains consistent with the corporate officer position described in Appendix D. This type of change is allowed under 10CFR50.54.a and does not require prior NRC approval to implement.

Change 1C: The discussion regarding the Security Plan, Emergency Plan and the Fire Protection Program in Section 2.0 has been deleted. A related reference included in Appendix B and the discussion in Appendix C regarding the Fire Protection Program has been deleted. Since the requirements to have programs and procedures to implement these licensing requirements have not been altered, prior approval to include this information in the DQAP was a change that was previously approved by the NRC. These changes are considered reductions in commitments to the previously approved DQAP that will require NRC approval to implement.

Change 1D: All sections except 1.0, 2.0, 5.0 and 18.0 are being completely rewritten using similar language that has been previously approved by the NRC for other nuclear facilities that have transferred all of the spent nuclear fuel to the ISFSI. These other facilities that have had their Quality Assurance Programs approved with similar language included CYAPCO, YAEC and MYAPCO. The SONGS regulatory basis of all spent fuel transferred to an ISFSI and program commitments will be consistent with each of these facilities at the time of implementation of the QAPs. The proposed DQAP

revision will be implemented in conjunction with the NRC approved LAR that reflects the condition that all of the spent fuel had been transferred to the ISFSI. This LAR will also reflect the removal from the Technical Specifications the SSCs associated with spent fuel storage in the Spent Fuel Pool. The requirements contained within these sections of the DQAP will ensure continued compliance with the requirements of 10CFR50 Appendix B, 10CFR71 Subpart H, and 10CFR72 Subpart G. The guidance will also continue to ensure conformance to the requirements of Regulatory Guide 7.10, Revision 2. Since these sections of the DQAP are being completely rewritten and there is no corresponding SER, these changes are considered reductions in commitments to the previously approved DQAP that require prior NRC approval to implement.

Change 1E: Section 5.0 has been modified to eliminate the need to perform periodic procedure reviews, as well as simplifying some of the guidance. The elimination of periodic procedure reviews has been previously approved by the NRC at other facilities, but it is considered a reduction in commitments to the previously approved DQAP. In the static condition of an ISFSI with the need for reduced administrative controls that corresponds to the reduced risk, it is no longer necessary to perform periodic procedure reviews. Inconsistencies noted between the procedures and their technical or regulatory basis would be documented and corrected using the Corrective Action Program. Since some of the language included within this section of the DQAP is being eliminated, the changes to this section require prior NRC approval.

Change 1F: Section 18.0 has been modified to delete the specific discussion regarding audits of Emergency Preparedness and Safeguards programs. These audits/independent reviews are described in and required by other program documents (i.e., Emergency Plan and Security Plan) and associated regulations, such as 10CFR50 and 10CFR73. This change to eliminate this information is a reduction in commitments to the previously approved QAP because it specifies an annual frequency for these audits. The associated program documents and regulations will provide the basis for the frequency of performing these and other required audits/independent reviews. This type of change has been approved by the NRC for other facilities, but will require prior NRC approval to implement since it is a reduction to the previously approved DQAP. Several other administrative changes were made to this section, which do not require prior NRC approval to implement.

Change 1G: Appendix A “Organization Chart” has been modified and simplified to be a generic organizational chart that defines functional relationships, authorities and responsibilities. These organizational functions are also sufficiently described within Section 1.0 of the DQAP. Additionally, the new Appendix D, Administrative Controls (relocated Technical Specifications) provides some associated organizational requirements and responsibilities. Specifically, the “lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to and including all organizational positions responsible for the safe storage of the nuclear fuel. These relationships shall be documented and updated as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation.” This type of change is allowed under 10CFR50.54(a) and does not require prior NRC approval to implement.

Change 1H: A new Appendix B has been developed to list some key ITS SSCs in a high level summary. This is additional information being added to the DQAP that is not modifying any classifications of SSCs or commitments. This information is being added to make it easier to identify the key ITS SSCs controlled under the requirements of the DQAP. As noted above in 1A, the detailed list and classifications will remain in the SONGS Q-List. This is an administrative change and is not considered a reduction in commitment that requires prior NRC approval to implement.

Change 1I: Appendix C, “Quality Assurance Program for Fire Protection Program” has been deleted and replaced with the Regulatory Requirements and Commitments from Appendix B. This is considered a reduction in commitments to the previously approved DQAP that will require prior NRC

approval to implement. This change is justified since the requirements under 10CFR50.48(f) related to fire protection will continue to apply to the facility throughout decommissioning. The reference to Regulatory Guide 1.191, "Fire Protection Program for Nuclear Power Plants During Decommissioning and Permanent Shutdown" is termed a guidance document in this section. A corresponding change is to delete the associated reference to Regulatory Guide 1.191. This is considered a reduction in commitments to the previously approved DQAP that will require prior NRC approval to implement. The requirements for fire protection continue to be provided by 10CFR50.48(f) (remains an ongoing commitment) and the site Fire Protection Program.

Change 1J: An administrative change was made to Appendix C, Regulatory Requirements and Commitments which was to delete the reference to the NRC RIS 2000-18 and the exception to the reference, which is acceptable since the NIRMA Guidelines were added as guidance documents to Section 17.0 of the DQAP. Although this is an administrative change, it will require prior NRC approval to implement since this addition was a previous commitment that is being removed from the DQAP. Two (2) additional Alternatives were added that were previously approved for other operating and decommissioning nuclear facilities. Appendix C now provides the list of DQAP Commitments, including these two (2) new Alternatives. These changes are reductions in commitments to the previously approved DQAP that require prior NRC approval to implement.

Change 1K: Appendices D, "List of Acronyms" and E "References" have been deleted. This is an administrative change since the acronyms are provided within regulations and or approved procedures. The information contained within these Appendices do not provide any unique commitments and the references are developmental documents and not commitments. Neither change requires prior NRC approval to implement.

Change 1L: Appendix F, "Definitions" has been deleted. Although the majority of the definitions are consistent with those provided in the NRC regulations, the term "Quality Affecting" is unique to SONGS. Eliminating all of the definitions is an administrative change since the definitions are already provided in regulations and the implication of the "Quality Affecting" definition does not change. This is not a reduction in commitment to the previously approved DQAP and as such will not require prior NRC approval to implement.

Change 1M: The Nuclear Oversight Board (NOB) described in Appendix G has been replaced with an Independent Management Assessment (IMA) function and was moved to the new Appendix D. The IMAs are periodically performed to monitor overall performance and confirm that activities affecting quality comply with the DQAP and that the DQAP is effectively implemented. IMAs are performed by individual(s) designated by the executive officer, independent of activities assessed and who provide the appropriate level of expertise in the activities assessed. These results are reported in a timely fashion to the executive officer. These IMAs will ensure that independent oversight of activities being performed at SONGS will continue during fuel storage at the ISFSI and throughout decommissioning of the site. This also takes the place of an independent audit of the quality assurance functions. This is a reduction in commitments to the previously approved DQAP, but has been approved for other Licensees that have completed the transfer of spent fuel to an ISFSI. Since there was no associated SER with a consistent approval basis, this change requires prior NRC approval to implement.

Change 1N: The Onsite Review Committee (OSRC) described in Appendix G has been replaced with the Independent Safety Review (ISR) function and was moved to the new Appendix D. This change is a reduction in commitments to the previously approved DQAP, but is similar to that approved by the NRC with an associated SER for a revision to the VYNPS QAPM. This change was approved by the NRC, dated June 16, 2016 (ADAMS Accession No. 16165A467). Since this change is not identical to that of the VYNPS, it will require prior NRC approval to implement.

Change 1O: Appendix G has been modified to integrate the administrative controls previously relocated from the Technical Specifications into a single group of requirements for Units 1, 2 and 3 rather than maintaining 2 independent groups of requirements with nearly the identical language and it has also been renamed Appendix D. The same requirements and programs remain and the organization described continues to address all three (3) Units. This is primarily an administrative change and does not require prior NRC approval to implement.

Change 1P: The Appendix G discussion regarding ANSI N18.1-1971 has been modified to focus more specifically on being applicable to spent fuel safety and radiation protection personnel, including those individuals that will be performing the final status survey activities. This change in applicability of ANSI N18.1-1971 for staff qualifications is a reduction in commitments contained within the relocated Technical Specifications. This type of language change has been accepted for the Zion Station Quality Assurance Program (QAP) to reflect the completion of the transfer of spent fuel to the ISFSI completed in 2015, but this further modifies the language. This change would ensure the appropriate focus is provided for key activities regarding qualifications of personnel necessary for safely storing spent nuclear fuel and for radiation protection personnel as defined within approved procedures. This is a reduction in the application of the standard and requires prior NRC approval to implement.

Change 1Q: Appendix H, “DQAP Implementing Programs/Procedures” has been eliminated. This is a reduction in commitment that will require prior NRC approval since it was part of the basis for the previous approval of the DQAP by the NRC. It is not typical to have the list of quality implementing programs and procedures provided in a QAP. The requirement to maintain and implement quality procedures is still required by the DQAP in accordance with Section 5.0, “Instruction, Procedures and Drawings” and associated regulations. This change requires prior NRC approval to implement.

Change Group 2 – More Minor Administrative Changes (i.e., Editorial Changes and Clarifications):

A number of editorial changes and clarifications were made for consistency, clarity and to improve readability of the DQAP. These types of changes do not require prior NRC approval to implement; however, it has been determined that the entire DQAP requires prior NRC approval to implement. The following are the types of administrative changes that were made:

Change 2A: Corresponding changes were made throughout the document regarding the application of the DQAP to only important to safety SSCs and activities. This term was also added in various sections and in some specific cases “quality effecting” or “quality” has been replaced with “important to safety”. These changes are considered administrative since they are corresponding; however, they cannot be implemented without prior NRC approval as describe in Group 1Changes described above.

Change 2B: Various generic corresponding editorial changes were made to ensure continuity and consistency within the DQAP.

Change 2C: Changes were made throughout the document to reflect the modifications made to the Appendices to reflect the deletion of some and the addition of new information.

Change 2D: The Table of Contents was modified to reflect the changes and to integrate the updated List of Appendices within that section and modifying the associated page numbers.

Change 2E: Corrections of minor typographical and grammatical errors.

ATTACHMENT 2

SONGS DQAP Proposed Revision 6

DECOMMISSIONING QUALITY ASSURANCE PROGRAM (DQAP)

Revision 6

**Southern California Edison (SCE)
San Onofre Nuclear Generating Station (SONGS)**

Southern California Edison
San Onofre Nuclear Generating Station
Decommissioning Quality Assurance Program (DQAP)

Approvals



4/26/18

Manager, Regulatory Affairs and Nuclear Oversight

Date



4/26/2018

Executive Officer

Date

Introduction

Southern California Edison (SCE) announced plans on June 7, 2013, to permanently retire Units 2 and 3 at the San Onofre Nuclear Generating Station (SONGS). On June 12, 2013, SONGS submitted a Certification of Permanent Cessation of Power Operations to the Nuclear Regulatory Commission (NRC), certifying that SCE had permanently ceased power operations of SONGS Units 2 and 3. To address this changing environment at SONGS, a Decommissioning Quality Assurance Program (DQAP) has been developed to support station activities and the operation of the Independent Spent Fuel Storage Installation (ISFSI).

The SONGS DQAP reflects the quality activities pertaining to a decommissioning nuclear site through compliance with established regulatory requirements set forth by the NRC. The DQAP ensures the protection of the public health and safety through performance-based assessments and compliance-based auditing, utilizing implementing procedures and instructions. The DQAP describes the responsibilities for implementing important to safety requirements, establishing and maintaining the DQAP, and assessing the performance of activities subject to the DQAP. The implementation of the SONGS DQAP is performed in a graded approach commensurate with the items and activities' importance to safety.

The SONGS DQAP includes a general description of the organizational structure and functional responsibilities of station management regarding the implementation of important to safety activities and key facility activities at SONGS. The DQAP also outlines the key responsibilities for the Quality Assurance (QA) staff and program expectations for the associated station organizations. The DQAP satisfies the requirements of 10 CFR 50 Appendix B, *Quality Assurance Criteria for Nuclear Power Plants and Fuel Processing Plants*, 10CFR71, Subpart H, *Quality Assurance for Packaging and Transportation of Radioactive Material*, and 10CFR72, Subpart G, *Quality Assurance for Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste*. Additional regulatory commitments are listed within Appendix C of the DQAP.

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Organization

1.0 Organization

Southern California Edison (SCE) is responsible for the establishment and execution of the QA Program for the San Onofre Nuclear Generating Station (SONGS). The SCE organizational structure of functions involved with implementing the SONGS DQAP, as well as associated interfaces, is described below with a high level functional organizational structure presented in Appendix A. The titles of managers used in the DQAP are generic; their functional titles and their formal titles may vary. Unless otherwise specifically prohibited, responsibilities of managers described in the DQAP may be delegated to, and performed by, other qualified individuals.

The ultimate responsibility for operation, maintenance, inspection, test, modification, decommissioning, and storage of spent fuel resides with the SCE President. The executive officer ultimately reports to the SCE President and has the overall responsibility for the establishment and execution of the SONGS DQAP.

Responsibilities

The authorities and duties of persons and organizations performing activities affecting the important to safety functions of the Structures, Systems, and Components (SSC) defined in Appendix B are established and delineated in writing. These activities include both the performing functions of attaining quality objectives and the QA functions.

The executive officer is responsible for spent fuel safety, decommissioning of the station and nuclear oversight. The DQAP is reviewed and approved by the Manager responsible for Nuclear Oversight, and the executive officer.

The executive officer is responsible for apprising management of the effectiveness of the DQAP implementation and is the arbitrator for non-conformances of unusual complexity. The executive officer also directs actions to be taken based on reports and trending of quality issues submitted by the Manager responsible for Nuclear Oversight. Direction for implementing the DQAP activities is provided by the executive officer through the manager responsible for Nuclear Oversight.

Management of line organizations at SONGS are responsible to ensure that the quality of organizational work and activities meets the requirements set forth in the DQAP and SONGS implementing procedures.

Nuclear Oversight

The manager responsible for Nuclear Oversight reports to the executive officer and shall not be assigned responsibilities that would prevent the required attention to important to safety matters. Although reporting to the executive officer with other line organizations, the manager responsible for Nuclear Oversight shall have the necessary independence from other line management to ensure effective oversight for all organizations. The manager has the following responsibilities:

- Management of day-to-day oversight of implementation of the DQAP for all important to safety activities
- Authority and obligation to raise any conditions adverse to quality to the executive officer for resolution
- Assuring important to safety activities at SONGS are performed in accordance with implementing procedures

- Managing the performance of audits, assessments, and inspections in order to verify that important to safety activities have been correctly performed
- Reporting on oversight activities to the executive officer
- Authority to stop work when quality is adversely affected

Nuclear Oversight personnel report directly to the manager responsible for Nuclear Oversight and implement the relevant provisions of the DQAP utilizing written implementing procedures. They perform independent oversight of line functions and activities. A member of the Nuclear Oversight organization shall not perform oversight of activities for which the member has been directly responsible. Further, they have the responsibility and authority to stop work when quality is adversely affected and immediately raise concerns to the manager responsible for Nuclear Oversight.

Nuclear Oversight personnel shall have sufficient authority and organizational freedom to identify any quality problems and to verify implementation of corrective actions. Additionally, Nuclear Oversight personnel shall have direct access to appropriate levels of management necessary to perform their function and shall be independent from cost and schedule when opposed to quality and nuclear safety considerations.

Station Management

A manager responsible for decommissioning oversight reports to the executive officer and is responsible for managing all decommissioning project activities being performed at SONGS.

A manager that is responsible for the operation of the ISFSI, with responsibility for ISFSI engineering and emergency planning, reports to the executive officer.

Managers who are responsible for technical areas, such as engineering (design authority) and radiation protection report to the manager responsible for decommissioning.

The Independent Safety Reviewer (ISR) performs independent safety reviews as defined in Appendix D.

Other facility staff shall follow the requirements of Appendix D, *Administrative Controls*.

Other Corporate SCE Organizations (Business Operations)

- Supply Chain Management is responsible for procurement of materials, equipment and services, and for preparation, negotiations, and administration of procurement contracts for SONGS reporting to SCE Corporate Management.
- Corporate Records Center reports to SCE Corporate Management and is responsible for storage and retrieval of company records (including nuclear records) placed in their custody. They interface with site Records Management related to long term storage of nuclear records.

Delegation of Quality Assurance Work

SCE may delegate the execution of work under the DQAP to others such as contractors, agents, or consultants; however, SCE retains overall responsibility for those activities and the DQAP. Delegation is clearly identified in documentation and SCE retains the right to verify compliance with SCE quality requirements and regulatory requirements applicable to that organization's QA Program.

Reporting

SCE management is involved with QA matters on a continuing basis. Periodic reports summarizing the quality of SONGS activities are reviewed and approved by the manager responsible for Nuclear Oversight. These reports contain status of program adherence to the DQAP, issues identified, unresolved items, and/or other items of interest. These reports are submitted to the executive officer and other SONGS management as deemed appropriate.

The executive officer shall periodically have an Independent Management Assessment (IMA) performed to evaluate the effectiveness of the SONGS QA Program. The details of the IMA are described in Appendix D under Independent Reviews.

Quality Assurance Program

2.0 Quality Assurance Program

The QA Program for San Onofre Nuclear Generating Station (SONGS) is described in the Decommissioning Quality Assurance Program (DQAP). This DQAP provides control over important to safety and selected decommissioning related activities to an extent consistent with their importance to ensure safety and compliance as defined in procedures. The DQAP includes specific monitoring activities which are measured against acceptance criteria in a manner sufficient to provide SONGS management assurance that the important to safety activities are performed in an acceptable manner. The SONGS DQAP requirements apply to SSCs designated as important to safety defined in Appendix B and those associated regulatory programs in Appendix D.

The DQAP satisfies the requirements of 10 CFR 50 Appendix B *Quality Assurance Criteria for Nuclear Power Plants and Fuel Processing Plants*, 10CFR71, Subpart H, *Quality Assurance for Packaging and Transportation of Radioactive Material*, and 10CFR72, Subpart G, *Quality Assurance for Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste*. Additional regulatory commitments are listed within Appendix C of the DQAP. Implementation of the SONGS DQAP is controlled through separately issued procedures, instructions and drawings. Each organization is responsible for the establishment and implementation of procedures and instructions prescribing the important to safety activities for which they are responsible.

Important to safety activities shall be accomplished under suitably controlled conditions. Controlled conditions include the use of appropriate equipment; suitable environmental conditions for accomplishing the activity, such as adequate cleanliness; and assurance that all prerequisites for the given activity have been satisfied. The QA program takes into account the need for special controls, processes, test equipment, tools, and skills to attain the required quality, and the need for verification of quality by inspection and test.

Changes to the DQAP will be implemented in accordance with 10 CFR 50.54(a) and 10 CFR 71.106.

Program Control and Authority

The manager responsible for Nuclear Oversight is responsible for ensuring that the applicable portions of the DQAP are properly documented approved and implemented (with trained staff, necessary materials and approved procedures available) before an activity within the scope of the DQAP is executed. Disputes arising between departments or organizations on any QA matter that cannot be resolved at a lower level of management will be referred to the executive officer.

Additional requirements for specific programs are described in Appendix D, *Administrative Controls*

Personnel Training and Qualifications

Individual managers are responsible for ensuring that personnel working under their cognizance are provided with the necessary indoctrination training and resources to accomplish assigned activities which fall under the scope of the DQAP.

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. These implementing procedures provide the criteria utilized for determining and assessing appropriate staff qualification. Additionally, Appendix D cites references that stipulate the use of specific industry standards addressing qualifications. Training programs are established and implemented to ensure that personnel achieve and maintain suitable proficiency. Personnel training and qualification records are maintained in accordance with approved procedures.

QA Lead Auditors are qualified and certified by the manager responsible for Nuclear Oversight in accordance with approved procedures. Training methods, minimum experience requirements, and certification practices are in accordance with established procedures and based on criteria set forth in QA implementing procedures. Proficiency evaluations are performed and documented as defined in approved procedures.

Records of the implementation for staff indoctrination and training, as well as records for Lead Auditor, Auditor, Technical Specialist and Inspection Personnel qualification shall be maintained in accordance with approved procedures and show the appropriate documentary evidence of training completion.

Performance/Verification

- a. Personnel performing work activities such as design, engineering, procurement, installation, maintenance, modification, operation, and decommissioning are responsible for achieving acceptable quality.
- b. Personnel performing independent verification activities are responsible for verifying the achievement of acceptable quality and are different personnel than those who performed the work.
- c. Work is accomplished and verified using instructions, procedures, or other appropriate means that are of a detail commensurate with the activity's complexity and importance to safety.
- d. Criteria that define acceptable quality are specified, and quality is verified against these criteria.

Design Control

3.0 Design Control

The program will ensure that the activities associated with the design of important to safety structures, systems and components and modifications thereto, are executed in a planned, controlled, and orderly manner.

The program utilizes the guidance of NUREG/CR-6407 to classify structures, systems and components such that appropriate quality requirements are identified and documented on drawings, component lists, or procurement documents, as applicable.

The program includes provisions to control design inputs, processes, outputs, changes, interfaces, records, and organizational interfaces.

Design inputs (e.g., performance, conditions of the facility license, quality, and quality verification

requirements) shall be correctly translated into design outputs (e.g., specifications, drawings, procedures, and instructions).

The final design output shall relate to the design input in sufficient detail to permit verification. The design process shall ensure that materials, parts, equipment and processes are selected and independently verified consistent with their importance to safety to ensure they are suitable for their intended application.

Changes to final designs (including field changes and modifications) and dispositions of non-conforming items to either use-as-is or repair shall be subjected to design control measures commensurate with those applied to the original design and approved by the organization that performed the original design or a qualified designee. The original design organizations for the SCE ISFSI are identified in Appendix B. Subsequent changes to the original design can be made by SCE as defined in the design control process.

Interface controls (internal and external between participating design organizations and across technical disciplines) for the purpose of developing, reviewing, approving, releasing, distributing, and revising design inputs and outputs shall be defined in procedures.

Design documentation and records, which provide evidence that the design and design verification process was performed in accordance with the QAP, shall be collected, stored, and maintained in accordance with documented procedures. This documentation includes final design documents, such as drawings, and specifications, and revisions thereto and documentation which identifies the important steps, including sources of design inputs that support the final design.

Design Verification

The program will verify the acceptability of design activities and documents for the design of items. The selection and incorporation of design inputs and processes, outputs and changes are verified.

Verification methods include, but are not limited to, design reviews, alternative calculations, and qualification testing. The extent of this verification will be a function of the importance to safety of the item, the complexity of the design, the degree of standardization, the state of the art, and the similarity with previously proven designs.

When a test program is used to verify the acceptability of a specific design feature, the test program will demonstrate acceptable performance under conditions that simulate the most adverse design conditions that are expected to be encountered.

Independent design verification is to be completed before design outputs are used by other organizations for design work and before they are used to support other activities such as procurement, manufacture, or construction. When this timing cannot be achieved, the unverified portion of the design is to be identified and controlled. In all cases, the design verification is to be completed before relying on the item to perform its important to safety function.

Individuals or groups responsible for design reviews or other verification activities shall be identified in procedures and their authority and responsibility shall be defined and controlled. Design verification shall be performed by any competent individuals or groups other than those who performed the original design, but who may be from the same organization. The designer's immediate supervisor or manager may perform the design verification and controls for this are defined in approved procedures.

Design verification procedures are to be established and implemented to ensure that an appropriate verification method is used, the appropriate design parameters to be verified are chosen, the acceptance criteria is identified, the verification is satisfactorily accomplished and the results are properly recorded.

Procurement Document Control

4.0 Procurement Document Control

The program will ensure that purchased items and services are of acceptable quality.

The program includes provisions for evaluating prospective suppliers and ensuring that selected suppliers continue to provide acceptable products and services.

The program includes provisions for taking corrective action with suppliers (qualified or otherwise) whose products and services are not considered acceptable.

The program includes provisions for source verification (inspection, audit, etc.) for accepting purchased items and services identified as important to safety when determined necessary.

The program includes provisions for invoking applicable technical, regulatory, administrative, and reporting requirements (e.g., specification, codes, standards, tests, inspections, special processes, records, certifications, 10 CFR 21) applicable to the procurement to be specified in procurements documents.

The program includes provisions for ensuring that documented evidence of an item's conformance to procurement requirements is available at the site before the item is placed in service or used unless otherwise specified in procedures.

The program includes provisions for ensuring that procurement, inspection, and test requirements have been satisfied before an item is placed in service or used unless otherwise specified in procedures.

The procurement of components, including spare and replacement parts, is subject to quality and technical requirements suitable for their intended service.

The program includes provisions for the identification of critical characteristics and methods of acceptance for the dedication of a commercial grade item or service for its use in an important to safety function(s).

Instructions, Procedures and Drawings

5.0 Instructions, Procedures and Drawings

Measures are established to assure that quality activities are prescribed by and performed in accordance with documented instructions, procedures, or drawings. These instructions, procedures, and drawings include, as appropriate, quantitative or qualitative acceptance criteria for determining that activities have been satisfactorily accomplished. Controls are established which ensure that instructions, procedures, and drawings are current and accurately reflect the facility design and regulatory requirements.

Changes or deviations from established instructions, procedures or drawings for SSCs and other quality activities that have current important to safety functions, require the same review and approval as the original document. Instructions, procedures and drawings, including changes and deviations subject to the SONGS DQAP, shall be maintained as required by administrative procedures.

Administrative controls may be established that provide the methods by which temporary changes can be made to procedures which are approved, including the designation of persons authorized to approve such changes.

Document Control

6.0 Document Control

The program will control the development, review, approval, issue, use, and revision of documents.

The scope of the document control program includes, but is not limited to:

- a. Safety Analysis Report(s);
- b. NRC License Documents, including Technical Specifications;
- c. Design Documents and Drawings;
- d. Procurement Documents;
- e. Procedures, Manuals, Plans, Directives, Policies, Instructions, etc.;
- f. Corrective Action Documents; and
- g. Other documents as defined in procedures.

Rewards of controlled documents are reviewed for adequacy and approved for release by the same organization that originally reviewed and approved the documents or by a designated organization that is qualified and knowledgeable.

Copies of controlled documents are distributed to and used by the person performing the activity.

The distribution of new and revised controlled documents is in accordance with procedures. Superseded documents are controlled to prevent inadvertent use.

Control of Purchased Materials, Equipment and Services

7.0 Control of Purchased Materials, Equipment and Services

The program will verify the quality of purchased items and services at intervals and to a depth consistent with the item's or service's importance to safety, complexity and quality of the item or service. Control of items and services for important to safety applications are clearly and adequately specified in procurement documents.

The program is executed in all phases of procurement. As necessary, this may require verification of activities of suppliers below the primary supplier of the item or service.

Procedures shall describe each organization's responsibilities for the control of purchased material, equipment and services including the interfaces between all affected organizations.

Controls for the audits or surveys of suppliers providing important to safety items and services are provided for in Section 18.

Controls for the inspection (source verification/surveillance/inspection) of suppliers providing important to safety items and services are provided for in Section 10.

Identification and Control of Materials, Parts and Components

8.0 Identification and Control of Materials, Parts and Components

The program will identify and control important to safety items to prevent the use of incorrect or defective items.

Identification of each item is maintained throughout fabrication, erection, installation, and use so that the item can be traced to its documentation. Traceability is maintained to an extent consistent with the item's importance to safety.

Control of Special Processes

9.0 Control of Special Processes

This program will ensure that special processes identified as important to safety are properly controlled.

The criteria that establish which processes are special are described in procedures. The following are examples of special processes:

- a. Welding;
- b. Heat treating;
- c. NDE (Non-Destructive Examination);
- d. Chemical cleaning; and
- e. Unique fabricating or test processes which require in-process controls.

Special processes are accomplished by qualified personnel, using appropriate equipment, and procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements.

Inspection

10.0 Inspection

The program will ensure inspections of important to safety activities are planned, executed and documented in order to verify conformance with instructions, procedures and drawings for accomplishing the activity.

Provisions to ensure inspection planning is properly accomplished are to be established. Planning activities shall identify the characteristics and activities to be inspected, the inspection techniques, the acceptance criteria, and the organization responsible for performing the inspections.

Provisions to identify inspection hold points, beyond which work is not to proceed without the consent of the inspection organizations are to be defined.

Inspection results are to be documented by the inspector and reviewed by qualified personnel.

Unacceptable inspection results shall be evaluated and resolved in accordance with procedures.

Inspections are performed by qualified personnel other than those who performed or directly supervised the work being inspected. While performing the inspection activity, inspectors functionally report to the nuclear safety manager.

Test Control

11.0 Test Control

The program will demonstrate that items will perform satisfactorily in service using approved test procedures.

The test control program includes, as appropriate, proof tests before installation, pre-operational tests, post-maintenance tests, post-modification tests, and operational tests.

Test procedures shall be developed which include:

- a. Instructions and prerequisites to perform the test;
- b. Use of proper test equipment;
- c. Acceptance criteria; and
- d. Mandatory inspections, as required.

Test results are evaluated and documented to assure that test objectives and inspection requirements have been satisfied.

Unacceptable test results shall be evaluated and documented for impact on safety and reportability.

Control of Measuring and Test Equipment

12.0 Control of Measuring and Test Equipment

The program will control the calibration, maintenance and use of measuring and test equipment consistent with activities important to safety to ensure accuracy.

Calibration reference standards shall be based on traceability to nationally recognized standards. Where national standards do not exist, M&TE is calibrated against standards that have an accuracy of at least four (4) times the required accuracy of the equipment being calibrated, or when this is not possible have an accuracy that ensures the equipment being calibrated will be within the required tolerance. Special calibration and control measures are not required when normal commercial practices provide adequate accuracy (e.g., rulers, tape measures, level, and other such devices).

The types of equipment covered by the program (e.g., instruments, tools, gages, and reference and transfer standards) are defined in procedures.

Measuring and test equipment is calibrated at specified intervals or immediately before use on the basis of the item's required accuracy, intended use, frequency of use, stability characteristics and other conditions affecting its performance.

Measuring and test equipment is labeled, tagged, or otherwise controlled to indicate its traceability to calibration test data.

Measuring and test equipment found damaged or out of calibration is tagged or segregated. The acceptability shall be determined of items measured, inspected, or tested with a damaged or out-of-calibration device.

Handling, Storage and Shipping

13.0 Handling, Storage and Shipping

The program will control the handling, storage, shipping, cleaning, and preserving of items to ensure the items maintain acceptable quality.

Special protective measures (e.g., containers, shock absorbers, accelerometers, inert gas atmospheres, specific moisture content levels and temperature levels, etc.) are specified and provided when required to maintain acceptable quality.

Specific procedures shall be developed and used for cleaning, handling, storage, packaging, shipping and preserving items when required to maintain acceptable quality.

Items are marked and labeled during packaging, shipping, handling, and storage to identify, maintain, and preserve the item's integrity and identify the need for any special controls.

Inspection, Test and Operating Status

14.0 Inspection, Test and Operating Status

The program will ensure that required inspections and tests and the operating status of items important to safety is verified before release, fabrication, receipt, installation, test, and use, as applicable. This verification is to preclude inadvertent bypassing of inspections and tests and to prevent inadvertent operation of controlled equipment. Operating status is identified by the use of tags, markings, stamps, or other suitable means.

Items whose required inspections and tests are incomplete or inconclusive may be released for further processing. Controls are provided in procedures for establishing limitations on the release, applying status indications and documenting the basis for the conditional release of the item and any limitations.

The application and removal of inspection, test, and operating status indicators are controlled in accordance with procedures.

Non-conforming Materials, Parts or Components

15.0 Nonconforming Materials, Parts or Components

SCE establishes measures to control important to safety materials, parts and components which do not conform to requirements. The measures used to control nonconforming materials, parts and components are described by approved procedures.

Management at all levels and each individual working at the facility is responsible for promptly identifying and reporting the identification of nonconforming materials, parts and components.

The corrective action program will be used to ensure the prompt identification, documentation, and correction of nonconforming materials, parts and components as described in Section 16.0.

Nonconforming items are properly controlled by approved procedures describing the identification, documentation, segregation requirements disposition and notification to the affected organizations to prevent their inadvertent installation or use. Nonconforming items are reviewed and either accepted, rejected, repaired, or reworked in accordance with approved procedures.

Corrective Action

16.0 Corrective Action

Each individual working at the facility is responsible for promptly identifying and reporting conditions adverse to quality. Management at all levels encourages the identification of conditions that are adverse to quality.

Significant conditions adverse to quality shall require cause determination, a corrective action that should prevent recurrence, and be documented and reported to appropriate levels of management. Follow-up action shall be taken to verify effective implementation of the required corrective actions to prevent recurrence and to verify that they are effectively implemented.

Specific responsibilities within the corrective action program may be delegated, but SCE maintains responsibility for the program's effectiveness.

Reports of conditions that are adverse to quality are analyzed to identify negative performance trends. Significant conditions adverse to quality and significant trends are reported to the appropriate levels of management.

Quality Assurance Records

17.0 Quality Assurance Records

The program will ensure that sufficient records of important to safety items and activities affecting quality (e.g. design, engineering, procurement, manufacturing, construction, inspection and test, installation, pre-operation, startup, operations, maintenance, modification, decommissioning, and audits) are generated and maintained to reflect the completed work.

Controls for the administration, identification, receipt, storage, preservation, safekeeping, retrieval, and disposition of records are provided in procedures.

Management of the electronic storage of records will utilize the guidance provided in the following industry standards as described in approved procedures:

- NIRMA TG 11-2011, *Authentication of Records and Media*
- NIRMA TG 15-2011, *Management of Electronic Records*
- NIRMA TG 16-2011, *Software Quality Assurance Documentation and Records*
- NIRMA TG 21-2011, *Required Records Protection, Disaster Recovery and Business Continuation*

Records generated for SSCs that were once classified as safety-related or quality-related but no longer have a safety function do not need to be retained for purposes of the DQAP (but may need to be retained for other purposes, such as compliance with 10 CFR 50.75(g), other regulations, or for business reasons).

Audits

18.0 Audits

SCE establishes measures for a system of planned and documented audits in order to verify compliance with all aspects of the DQAP, and determines the effective implementation of programs covered by the DQAP. QA internal and supplier audits are planned and performed by qualified auditors utilizing approved written procedures and/or checklists. External audits by licensees / utilities, Contractors, or Consultants acting for SCE to satisfy SCE audit requirements shall have the results evaluated by SCE to ensure acceptability.

Lead Auditors shall have experience, training or qualifications commensurate with the scope and complexity of their audit responsibility. Individuals performing audits shall not have direct responsibilities in the areas being audited.

Scheduling, preparation, personnel selection, performance, reporting, response, follow-up, and records management for audits are performed in accordance with written procedures. Audit scopes and schedules are based upon the status of work progress, important to safety activities being performed, and regulatory requirements. 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, 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 site implementing procedures which govern the conduct of QA audits.

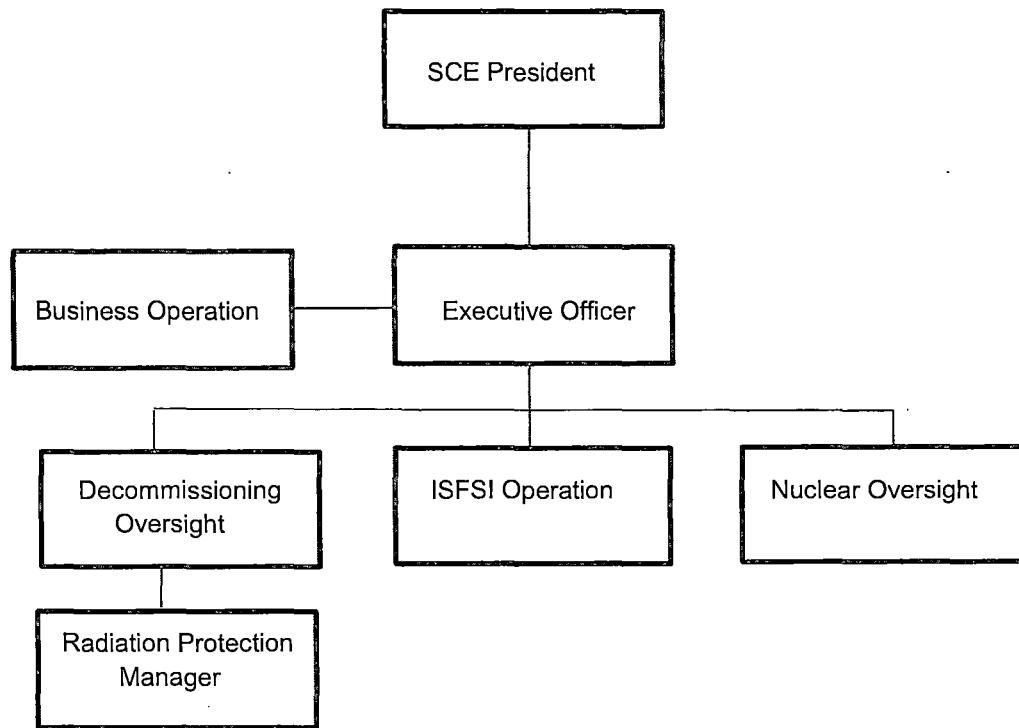
External audits of suppliers providing important to safety materials, parts, equipment or services are scheduled and performed based on the importance of the activity and to confirm implementation of the supplier's QA Program at a frequency of not less than three (3) years with a 90 day grace period. The supplier audit requirement shall not apply to standard off-the-shelf items and bulk commodities where required quality can adequately be determined by receipt inspection or post-installation test.

Audit reports shall be prepared, reviewed, approved and distributed in accordance with approved procedures.

Results of audits are reviewed with the management of the organization audited. Responsible management in the areas audited shall implement the necessary corrective actions required to address deficiencies. These actions are documented and reviewed periodically and, if needed, re-examined during re-audits of the subject area to verify deficient areas have completed corrective actions.

Audit records shall be retained in accordance with approved implementing procedures.

Appendix A: Organization Chart



Functional Organization Chart

All positions are not defined and ultimate reporting is to the SCE President

Appendix B: Important to Safety (ITS) Structures, Systems and Components

The pertinent quality assurance requirements of 10CFR50 Appendix B, 10CFR 71 Subpart H and 10 CFR 72 Subpart G will be applied, as a minimum, to all quality activities affecting important to safety (ITS) SSCs associated with spent fuel storage and transportation packages. (Notes 1 & 4)

NOTE

The safety classification of SSCs at SONGS may be revised based on engineering evaluations and a revision to the SONGS engineering classification documentation. These modifications are controlled in accordance with the design control process and are not considered a reduction in the commitments to the DQAP. Such changes are subject to regulatory review processes in accordance with 10 CFR 50.59 and 72.48.

ITS SSCs associated with spent fuel storage and radioactive material transportation packages are detailed in the noted engineering classification and include:

A. Dry Spent Fuel Storage (10 CFR 72)

SSC (Note 2)
Multi-Purpose Dry Storage Canisters
Canister Overpack
ISFSI Pad

B. Transport of Spent Fuel and GTCC Waste (10 CFR 71)

Fuel SSC
Multi-purpose Storage Canister Transportable
Transport Cask

GTCC Waste SSC
GTCC Waste Canister (Note 3)

C. Radioactive Material Transport Packages (10 CFR 71)

Radioactive Material Transport Packages other than the GTCC canisters noted above are also subject to the provisions of 10 CFR 71, Subpart C, "General Licenses" are "Important-to-Safety" and subject to the applicable requirements of the DQAP.

NOTES:

1. Administrative Controls are used to define the quality category, which is currently the Q-List.
2. Transnuclear Storage System and Holtec Storage System
3. The storage of GTCC Waste Container does not have to be addressed under 10CFR72 per NRC Interim Staff Guidance (ISG-17).
4. For the definition of Quality Categories A, B, and C refer to NUREG/CR-6407.

Appendix C – Regulatory Requirements and Commitments

Regulatory Requirements:

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*.

Regulatory Commitments:

1. 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.
2. NUREG/CR-6407, *Classification of Transportation Packaging and Dry Fuel Storage System Components According to Important to Safety (2/96)*.

Alternatives

1. Letter from NRC to Arizona Public Service Company titled "Palo Verde Nuclear Generating Station, Units 1, 2 and 3 – Approval of Change to Quality Assurance Program (Commercial-Grade Calibration Services) TAC Nos. MC4402, MC4403, and MC4404" and associated NRC Safety Evaluation dated September 28, 2005.
2. Suppliers providing commercial grade calibration and testing services, who are accredited by a nationally recognized accrediting body, as described in Nuclear Energy Institute (NEI) 14-05 guidelines, may be used without additional qualification, provided the conditions of the associated NRC Safety Evaluation are met. Controls shall be established in applicable procedures to ensure the requirements of the NRC Safety Evaluation are satisfied prior to acceptance.

Appendix D: Administrative Controls

A. INDEPENDENT REVIEWS

1.0 Independent Management Assessment (IMA)

The executive officer shall periodically have an IMA performed to evaluate the effectiveness of the SONGS QA Program. These IMAs are performed by individual(s) designated by the executive officer who are independent of SONGS oversight activities and who have the appropriate level of expertise in the activities assessed. These periodic IMAs 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 assessment. The IMA 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 executive officer.

2.0 Independent Safety Review (ISR)

Independent Safety Reviewers perform ISRs of proposed changes, tests and experiments to important to safety SSCs, activities, program documents and procedures that are subject to the SONGS DQAP requirements. Independent Safety Reviewers shall be individuals without direct responsibility for the performance of activities under review, and shall be competent and knowledgeable in the subject area being reviewed. Independent Safety Reviewers shall have at least 5 years of professional experience and either a Bachelor's Degree in Engineering or the Physical Sciences or shall have equivalent qualifications in accordance with ANSI N18.1-1971. Independent Safety Reviews must be completed prior to implementation of proposed activities. The manager responsible for the overall operational activities (or designee) shall document the appointment of Independent Safety Reviewers as defined in procedures.

B. INTEGRATED REQUIREMENTS RELOCATED FROM UNITS 1, 2 & 3 TECHNICAL SPECIFICATIONS

1.0 Responsibility

- 1.1 The executive officer with direct responsibility for the facility shall be responsible for overall management of the San Onofre Nuclear Generating Station and all site support functions. The individual shall delegate in writing the succession to this responsibility during their absence.

2.0 Organization

2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for facility activities and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safe storage of the nuclear fuel.

- a. Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to and including all organizational positions responsible for the safe storage of nuclear fuel. These relationships shall be documented and updated as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These relationships, including the site-specific titles of those personnel fulfilling the responsibilities for the positions delineated in Appendix D are documented in the SONGS 1 Defueled Safety Analysis Report (DSAR) or the SONGS 2 and 3 UFSAR.
- b. The executive officer with direct responsibility for the facility shall be responsible for the overall safe storage of the nuclear fuel and shall have control over those onsite activities necessary to ensure the ongoing safe storage of the nuclear fuel.

- c. A specified executive officer shall have corporate responsibility for overall facility nuclear safety and shall take any measures needed to ensure acceptable performance of the staff to ensure the safe management of nuclear fuel.
- d. The individuals who carry out radiation protection and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their ability to perform their assigned functions.

3.0 Facility Staff Qualifications

- 3.1 Each member of the facility staff responsible for the safe storage of nuclear fuel and radiation protection personnel, including those performing final status survey activities shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions as defined in approved procedures except for: a) the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

4.0 Procedures, Programs and Manuals

4.1 Procedures

4.1.1 Scope

Written procedures shall be established, implemented, and maintained covering the following activities:

- a. Quality assurance for effluent and environmental monitoring using the guidance in Regulatory Guide 4.15, Revision 1, 1979;
- b. Fire Protection Program Implementation; and
- c. The following other Programs:
 - 1) Offsite Dose Calculation Manual (ODCM)
 - 2) Radioactive Effluent Control Program (RECP)
 - 3) Storage Tank Radioactivity Monitoring Program