

March 29, 2019

Hossein Hamzehee  
Licensing Manager  
Pacific Gas and Electric Company  
Diablo Canyon Power Plant  
P.O. Box 56  
Avila Beach, CA 93424

SUBJECT: ACCEPTANCE REVIEW OF HUMBOLDT BAY INDEPENDENT SPENT FUEL  
STORAGE INSTALLATION QUALITY ASSURANCE PLAN (REVISION 0) –  
REQUEST FOR SUPPLEMENTAL INFORMATION

Dear Mr. Hamzehee:

By letter dated February 14, 2019, Pacific Gas and Electric (PG&E) submitted Revision 0 of the Humboldt Bay Independent Spent Fuel Storage Installation Quality Assurance Plan to the U.S. Nuclear Regulatory Commission (NRC) for approval in accordance with License Condition 14 of Special Nuclear Material License Number 2514 (SNM-2514) (Agencywide Documents Access and Management System Accession No. ML19045A700). The NRC staff has performed an acceptance review of your application to determine if the application contained sufficient technical information to begin a detailed technical review. The staff has determined that the application does not provide sufficient technical information to begin a detailed review and that supplemental information is needed. The information needed to continue our review is described in the enclosed requests for supplemental information (RSIs).

Responses to the enclosed RSIs should be provided within 14 days from the date of this letter. If PG&E is unable to meet this response date, please notify NRC staff, within two weeks of receipt of this letter, of your new submittal date and the reasons for the delay. If the RSI responses do not provide sufficient information, the application may not be accepted for review.

H. Hamzehee

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Please reference Docket No. 72-27 and EPID No. L-2019-LLA-0037 in future correspondence related to the acceptance review for this licensing action. If you have any questions, please contact me at (301) 415-6877.

Sincerely,

**/RA/**

Chris Allen, Project Manager  
Spent Fuel Licensing Branch  
Division of Spent Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

Docket No.: 72-27  
EPID No.: L-2019-LLA-0037

Enclosure:  
Request for Supplemental Information

SUBJECT: ACCEPTANCE REVIEW OF HUMBOLDT BAY INDEPENDENT SPENT FUEL  
STORAGE INSTALLATION QUALITY ASSURANCE PLAN (REVISION 0) –  
REQUEST FOR SUPPLEMENTAL INFORMATION, DOCUMENT  
DATE: March 29, 2019

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JWoodfield, NMSS

DMarcano, NMSS

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**ADAMS Accession No.: ML19088A225**

<b>OFFICE:</b>	DSFM		DSFM		DSFM		DSFM		DSFM
<b>NAME:</b>	WAllen		WWheatley via e-mail		JWoodfield via e-mail		DMarcano		IBerrios
<b>DATE:</b>	3/27/19		3/28/19		3/28/19		3/28/19		3/29/19

**OFFICIAL RECORD COPY**

Request for Supplemental Information  
Docket No. 72-27

By letter dated February 14, 2019 (Agencywide Documents Access and Management System Accession No. ML19045A700), Pacific Gas and Electric (PG&E) submitted Revision 0 of the Humboldt Bay Independent Spent Fuel Storage Installation Quality Assurance Plan (QAP) to the NRC for approval in accordance with License Condition 14 of Special Nuclear Material License Number 2514. This request for supplemental information letter identifies information needed by the staff in connection with its review of the application. NUREG-1567, "Standard Review Plan for Spent Fuel Dry Storage Facilities," was used by the staff in its review of the application. Each individual request for supplemental information describes information needed by the NRC staff to complete its review of the application to determine whether the applicant has demonstrated compliance with the regulatory requirements.

**Quality Assurance Review**

1. Provide an amended Humboldt Bay Independent Spent Fuel Storage Installation Final Safety Analysis Report Chapter 11.

Chapter 11, "Quality Assurance," of the Humboldt Bay ISFSI Final Safety Analysis Report, Revision 6, states:

*10 CFR 72.140(b) states that each licensee shall establish, maintain, and execute a quality assurance program (QAP) satisfying each of the applicable criteria of Subpart G. Paragraph (d) of 10 CFR 72.140 states that a Commission-approved quality assurance program that satisfies the applicable criteria of Appendix B of Part 50 and which is established, maintained, and executed with regard to an ISFSI will be accepted as satisfying the requirements of 10 CFR 72.140(b).*

*Since PG&E is currently licensed under 10 CFR 50 to maintain a nuclear power facility, a Commission-approved QAP meeting the requirements of 10 CFR 50, Appendix B, is already in place...*

The Final Safety Analysis Report needs to reference the QAP that forms the basis for the license issued under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 72, "Licensing Requirements for the Independent Storage Of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste."

This information is needed to determine compliance with the requirements in 10 CFR 72.140(b).

Enclosure

2. Provide a revised QAP.

HBI-L6, Humboldt Bay Independent Spent Fuel Storage Installation Quality Assurance Plan, Revision 0 is presented as a QAP that meets the requirements of both 10 CFR Part 72, Subpart G and 10 CFR Part 71, Subpart H. PG&E states in both the submittal letter and in HBI-L6 itself, that the QAP satisfies the requirements of 10 CFR Part 72 Subpart G and 10 CFR Part 71 Subpart H for the procurement, maintenance, repair, and use of radioactive materials transport packages. PG&E further states that future changes to HBI-L6 will be made in accordance with the requirements in 10 CFR 71.106(b). However, 10 CFR 71.106(b) cannot be used to maintain a 10 CFR Part 72 QAP. Therefore, the applicant needs to replace all references to 10 CFR Part 71, "Packaging and Transportation of Radioactive Materials," regulations with the applicable 10 CFR Part 72 regulations.

This information is needed to determine compliance with the requirements in 10 CFR 72.140(b).