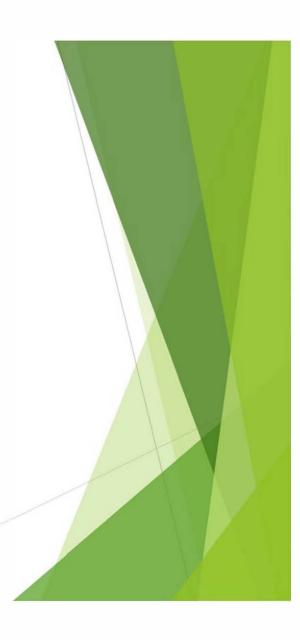


**Protecting People and the Environment** 

#### Status Update for the Near Miss Event at San Onofre Nuclear Generating Station (SONGS)

Marlone Davis NMSS/DSFM/IOB October 9, 2018

-OFFICIAL USE ONLY- SENSITIVE INTERNAL INFORMATION



# Agenda

- Introduction
- Background
- Brief Overview of Event
- Status Update



United States Nuclear Regulatory Commission Protecting People and the Environment



# Introduction

- The purpose of this presentation is to provide a brief overview and current updated status of the SONGS near missed event.
- Success for this presentation is to ensure that all interested parties have a general awareness of the event and some of the findings discovered during the special inspection conducted by the NRC.



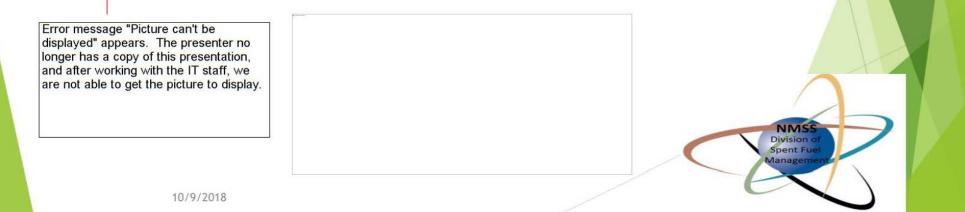


# BEST AVAILABLE COPY OFFICIAL USE ONLY- SENSITIVE INTERNAL INFORMATION Background

 Holtec International (Holtec) latest NRC approved spent fuel storage cask system used at Callaway Plant and San Onofre Nuclear Generating Station (SONGS).

**Protecting People and the Environment** 

- ➢ HI-STORM UMAX CoC No. 72-1040
- UMAX Underground MAX imum capacity storage system





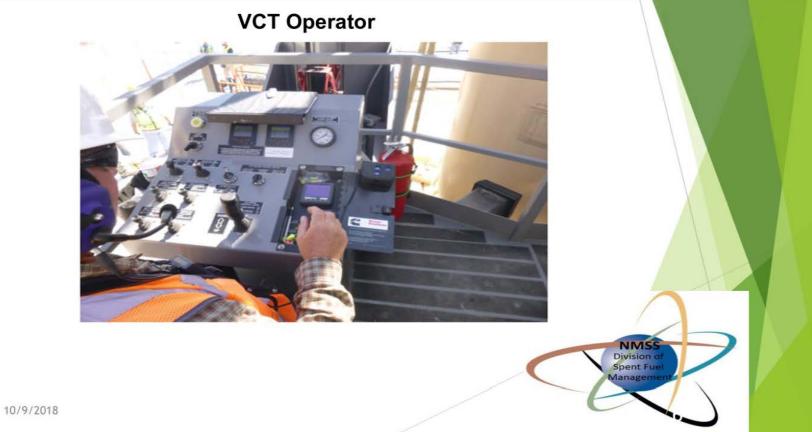
# Background

# Vertical Cask Transporter (VCT)



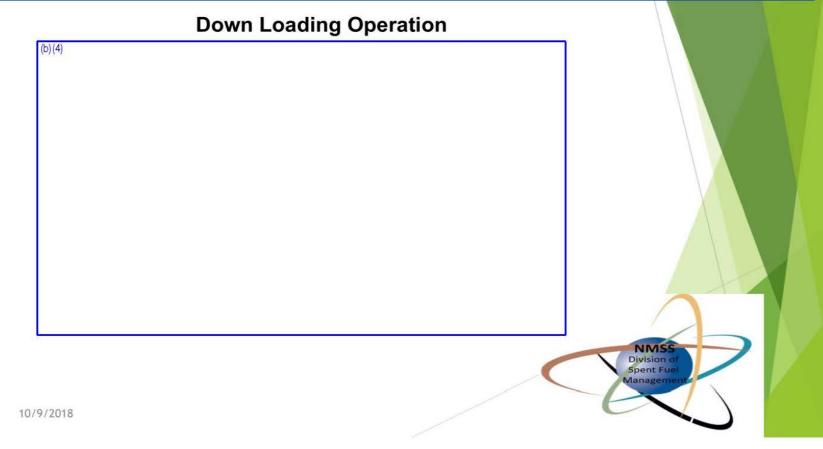


# Background



# United States Nuclear Regulatory Commission Protecting People and the Environment

# Background



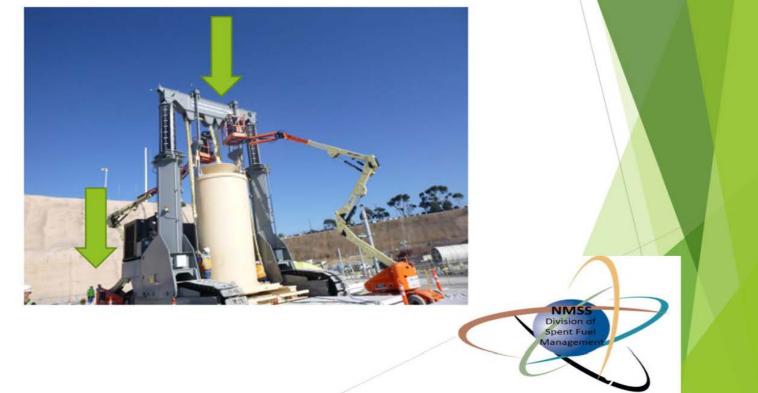


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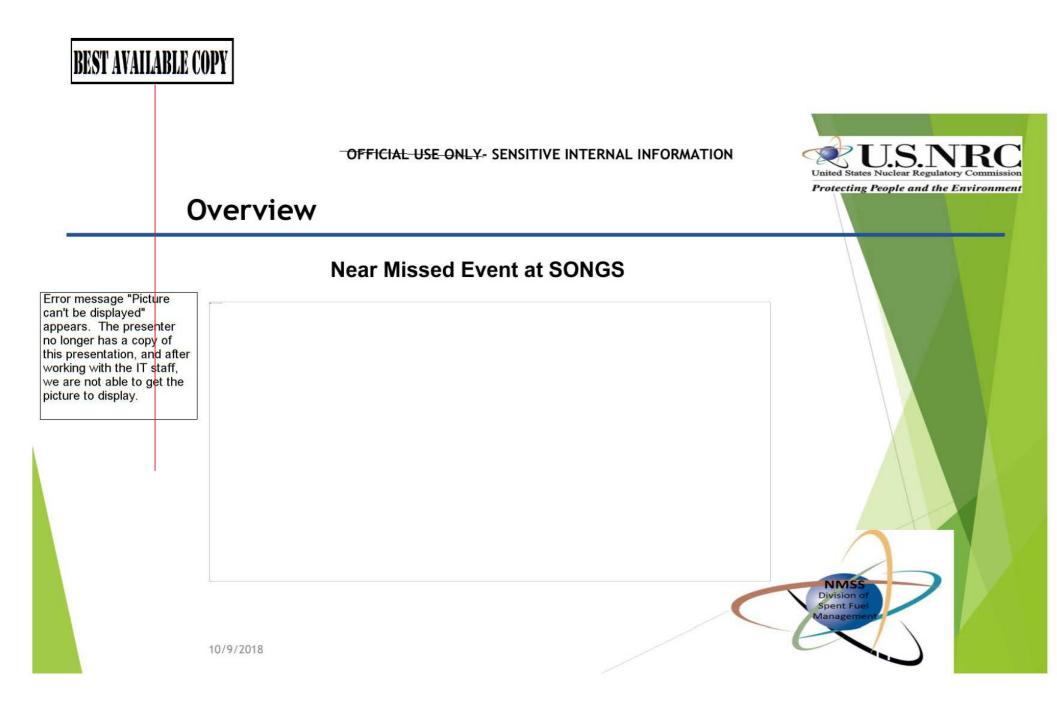
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#### OFFICIAL USE ONLY- SENSITIVE INTERNAL INFORMATION



# Background





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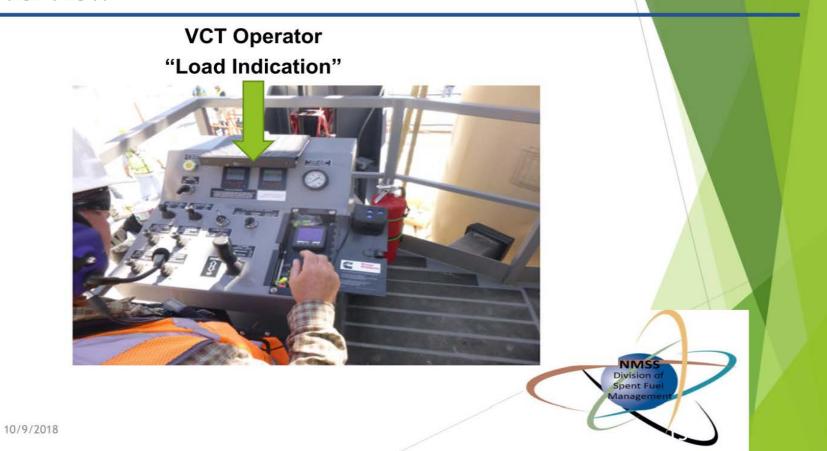
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# Overview

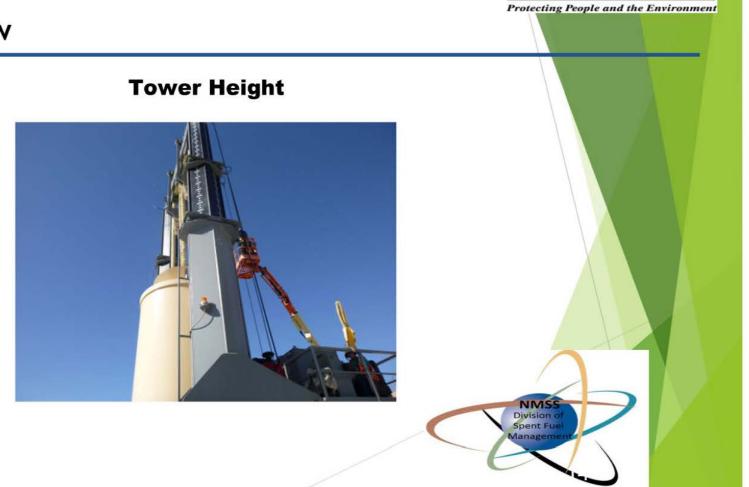






United States Nuclear Regulatory Commission Protecting People and the Environment

# Overview



United States Nuclear Regulatory Commission

# Overview



United States Nuclear Regulatory Commission Protecting People and the Environment

# **Overview**



United States Nuclear Regulatory Commission Protecting People and the Environment

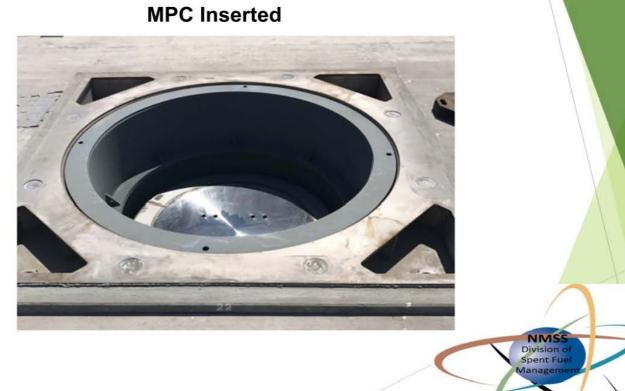
# Overview



United States Nuclear Regulatory Commission Protecting People and the Environment

# Overview





# Status Update

- Inspection team debriefed with five (5) violations.
- Inspection team is still waiting on SONGS and Holtec to complete their Apparent and Root Cause Evaluations
- There is currently a hold on loading and transfer operations.
- SONGS and Holtec are performing practice runs/demos with revised procedures.
- NRC plan on going to observe SONGS final demonstrations prior to initiating loading and transfer operations again







From:	(b)(7)(C)
Sent:	Thursday, August 30, 2018 10:19 AM
To:	(b)(7)(C)
Subject:	Fwd: (External):RE: (External):Cask Download Event Holtec Individuals

#### (b)(7)

My apologies, it looks like I didn't forward. Please see below for Item 2.B.3.3.

Thank you, (b)(7)(C)

Sent from my iPhone

Begin forwarded message:

From: <sup>(b)(7)(C)</sup>	
Date: August 29, 2018 at 2:53:13 PM PDT	27.00
Го: (b)(7)(C)	
Cc: (b)(7)(C)	

Subject: (External):RE: (External):Cask Download Event Holtec Individuals

(b)(7)(

Below is contact info for all of the involved individuals:

b)(7)(C)	
Holtec International   Site Services	
SON <u>GS Fuel Transfer</u> Operation Cell: <mark>(b)(7)(C)</mark> Office: 949.368.9089	
b)(7)(C)	

From: (b)(7)(C)	
Sent: Wednesday, August 29, 2018 10:26 AM	
<b>Fo:</b> (b)(7)(C)	

Subject: FW: (External):Cask Download Event Holtec Individuals

#### This email originated from a source OUTSIDE of Holtec. STOP and THINK before CLICKING on links or OPENING attachments

(b)(7)(C)	
SONGS ISFSI Expansion Project	
T. 949-368-9059   M. (b)(7)(C)	
5000 Pacific Coast Highway, San Clemente, CA 92674	
EDISON Energy for What's Ahead"	
From: <sup>(b)(7)(C)</sup>	
Sent: Tuesday, August 28, 2018 12:34 PM	
To: (b)(7)(C)	
Cc: <sup>(b)(7)(C)</sup>	19 - 1 - 1
Subject: (External):Cask Download Event Holtec Inc	lividuals
(b)(7)(C)	

Here are the individuals that were involved in the cask download event that will be available for the week of 9/10/18:

b)(7)(C)		
		_
(b)(7)(C)	٦	
cell: <sup>(b)(7)(C)</sup>		
mailto: <sup>(b)(7)(C)</sup>		

The information contained herein is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material from Holtec International. If you are not the intended recipient, you must not keep, use, disclose, copy or distribute this email without the author's prior permission. Further, review, retransmission, dissemination, or other use of this information in whole or part for any other purpose by persons outside the recipient's organization is strictly prohibited unless explicit authorization to such effect has been issued by the sender of this message. Holtec International policies expressly prohibit employees from making defamatory or offensive statements and infringing any copyright or any other legal right by Email communication. Holtec International will not accept any liability in respect of such communications. Holtec International has taken precautions to minimize the risk of transmitting software viruses, but we advise you to carry out your own virus checks on any attachment to this message. Holtec International cannot accept liability for any loss or damage caused by software viruses. If you are the intended recipient and you do not wish to receive similar electronic messages from us in the future then please respond to the sender to this effect. The information contained herein is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material from Holtec International. If you are not the intended recipient, you must not keep, use, disclose, copy or distribute this email without the author's prior permission. Further, review, retransmission, dissemination, or other use of this information in whole or part for any other purpose by persons outside the recipient's organization is strictly prohibited unless explicit authorization to such effect has been issued by the sender of this message. Holtec International policies expressly prohibit employees from making defamatory or offensive statements and infringing any copyright or any other legal right by Email communication. Holtec International will not accept any liability in respect of such communications. Holtec International has taken precautions to minimize the risk of transmitting software viruses, but we advise you to carry out your own virus checks on any attachment to this message. Holtec International cannot accept liability for any loss or damage caused by software viruses. If you are the intended recipient and you do not wish to receive similar electronic messages from us in the future then please respond to the sender to this effect.

		Procedure Number	SP-34
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	14	17 of 25	
Exhibit 8.1:	Standard Training Attendar	nce Sheet	
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Performed by:(b)(7)(C)			
(b)(7)(C)	Pri	int Name	

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Exhibit 8.1: Standard Training Attendance Sheet

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Sign Name	Print Name	
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#### TRAINING OF SUBCONTRACTED SITE SERVICES PERSONNEL

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Use Category R	eference
Revision 14	Page 17 of 25

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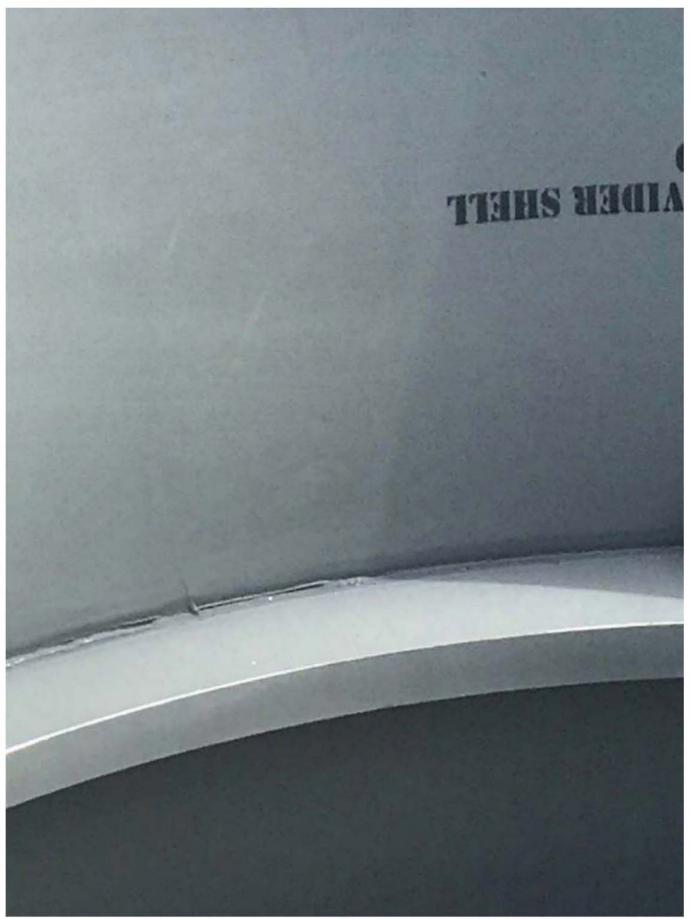
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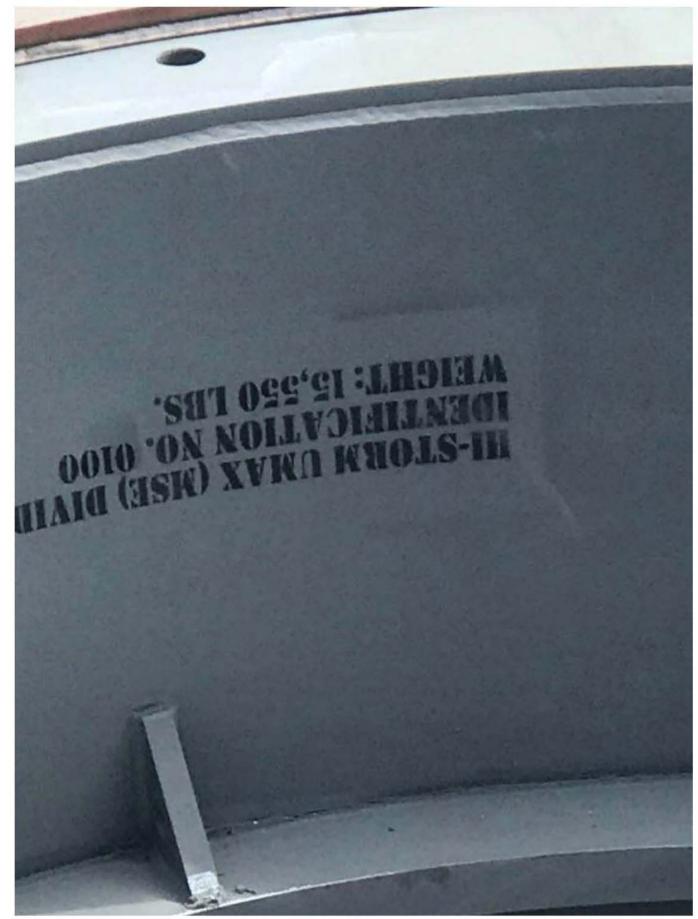
From:
Sent:
To:
Cc:
Subject:

#### (b)(7)(C)

Tuesday, August 28, 2018 10:55 AM (b)(7)(C)

(External):Divider shell photos





(b)(7)(C)		
cell: (b)	(7)(C)	
cell: <sup>(b)</sup> mailto:	(b)(7)(C)	

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GETPAT: Plant Access Training (Does not imply individual currently holds Protected Area Unescorted Access)	9	QUALIFIED	10/11/2011
GETRWT: RADIATION WORKER QUALIFICATION	6	QUALIFIED	10/12/201
SSCM06: FME Worker		QUALIFIED	LIFETIM
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10/19/2017

Task Qualification	Rev	Qualification Status	Expiration/Reason
SSCM06: FME Worker	3	QUALIFIED	LIFETIME
SSCM07: Fork Lift Operator	1	QUALIFIED	11/29/2020
SHIPRW: 49CFR HAZARDOUS MATERIAL EMPLOYEE TRAINING	3	QUALIFIED	10/23/2020
SSMM16: NUREG 0612 Program	1	QUALIFIED	4/18/2019
GETRWT: RADIATION WORKER QUALIFICATION	6	QUALIFIED	10/12/2018
GETPAT: Plant Access Training (Does not imply individual currently holds Protected Area Unescorted Access)	9	QUALIFIED	10/11/2018
SSMM13: Gantry/Overhead Crane Operator	1	QUALIFIED	5/10/2018

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Facilitator:	(b)(7)(C)	Loca	
Name	Title	Company	Signature

Page 1 of 2

TRAINING OF SU	BCONTRACTED	ITE	Use Category R	eference
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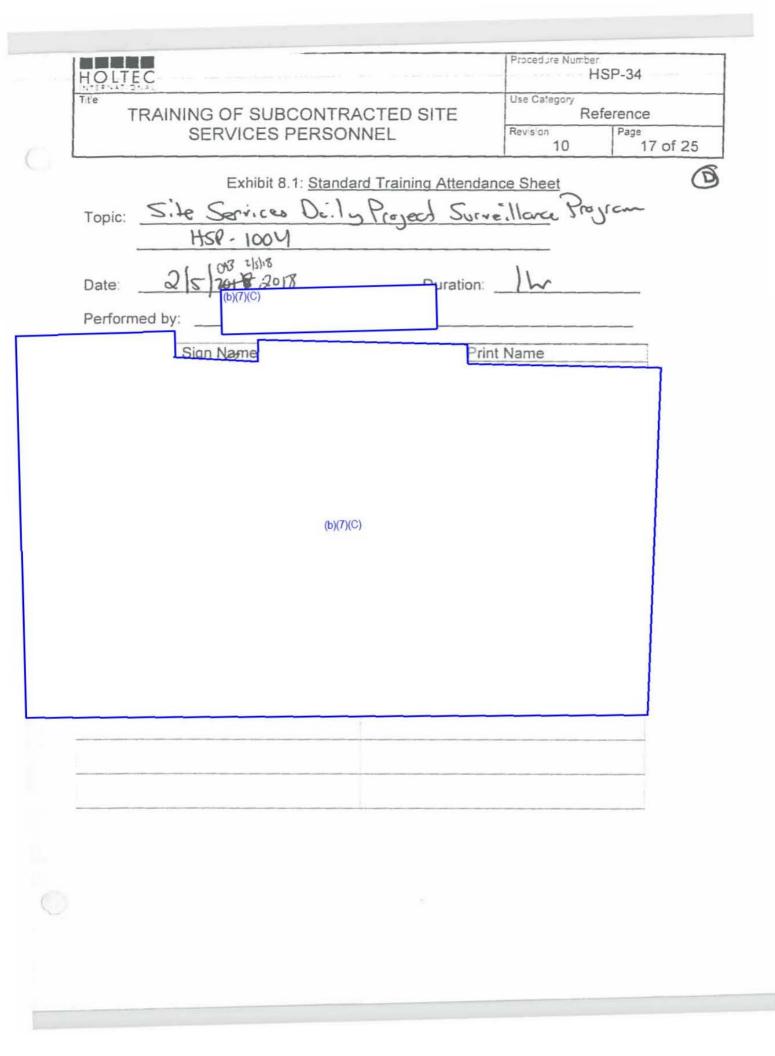
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Holtec Technology Campus, 1 Holtec Boulevard, Camden, NJ 08104

Site Expectations Brief 11.8.17

# 43

0	Name	Signature /	Title
b)(7)(C)			



### PROCEDURE FOR DAILY PROJECT MANAGEMENT SURVEILLANCE PROGRAM

HSP-1004 R4

Page 8 of 10

### ATTACHMENT 8.1: OBSERVATION PARTICIPANT ACKNOWLEDGMENT

(b)(4), (b)(7)(C)

14 -----

2.2. 8.

HOLTEC		SI Expansion		
Topic(s): Human Perfe Presenter(s): (b)(7)(C)	ormance Training a	nd Safety Metrics		
Date: January 18, 2	2018	ATTENDEES	ניאב_:	
Printed Name		Signature	Company	Title/Craft
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Task Qualification	Rev	Qualification Status	Expiration/Reason
SSCM06: FME Worker	3	QUALIFIED	LIFETIME
SSCM07: Fork Lift Operator	1	QUALIFIED	11/29/2020
SHIPRW: 49CFR HAZARDOUS MATERIAL EMPLOYEE TRAINING	3	QUALIFIED	10/23/2020
SSMM16: NUREG 0612 Program	2	QUALIFIED	4/18/2019
SSMM13: Gantry/Overhead Crane Operator	1	QUALIFIED	4/10/2019
GETRWT: RADIATION WORKER QUALIFICATION	6	QUALIFIED	10/12/2018
GETPAT: Plant Access Training (Does not imply individual currently holds Protected Area Unescorted Access)	9	QUALIFIED	10/11/2018

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4/26/2018

### Task Qualification: SSMM16: NUREG 0612 Program

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Name	Task Qualification	Re	v Qualification Status	Expiration/Reason
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	SSMM16: NUREG 0612 Program	2	QUALIFIED	8/6/2019
	SSMM16: NUREG 0612 Program	2	QUALIFIED	7/25/2019
	SSMM16: NUREG 0612 Program	2	QUALIFIED	7/11/2019
	SSMM16: NUREG 0612 Program	2	QUALIFIED	7/11/2019
	SSMM16: NUREG 0612 Program	2	QUALIFIED	7/10/2019
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	SSMM16: NUREG 0612 Program	2	QUALIFIED	7/9/2019
	SSMM16: NUREG 0612 Program	2	QUALIFIED	6/13/2019
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	SSMM16: NUREG 0612 Program	2	QUALIFIED	6/4/2019
	SSMM16: NUREG 0612 Program	2	QUALIFIED	6/4/2019
	SSMM16: NUREG 0612 Program	2	QUALIFIED	6/4/2019
	SSMM16: NUREG 0612 Program	2	QUALIFIED	4/18/2019
	SSMM16: NUREG 0612 Program	2	QUALIFIED	4/18/2019
	SSMM16: NUREG 0612 Program	2	QUALIFIED	4/18/2019
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	SSMM16: NUREG 0612 Program	2	QUALIFIED	4/10/2019

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(b)(7)(C)				
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2464.ISFSI Expansion Project

Duration: 120 min

Power Point Safety Gap Training

Topic(s): Overview, Fitness for Duty, Heat Illness Prevention, Medical Emergencies and First Aid, PPE, Barriers, and Signage, Hearing Protection, Personal Protective Equipment, Hazard Communication, Compressed Gas, Fire Prevention, Electrical Safety, Ladder and Stair Safety, Scaffold Users Training.

Presenter(s): (b)(7)(C)Date: 06/27/2018

ATTENDEES

Printed Name	Signature/	Company	<u>Title/Craft</u>
	(b)(7)(C)		

### Exhibit 2: Employee Acknowledgement Form

### EMPLOYEE ACKNOWLEDGEMENT FORM

#### CODE OF SAFE PRACTICES

I \_\_\_\_\_\_print), hereby acknowledge that I have received, read, and understand the "Code of Safe Practices" for Holtec employees including Contractors on our job site.

I agree to conform to all Company practices, rules, and regulations relating to safe work performance.

I understand that my failure to follow these safety procedures may result in disciplinary action up to and including discharge.

I further understand that:

(b)(7)(C)

- a. It is my responsibility to report all unsafe conditions or violations of the Code of Safe Practices to my Supervisor or other management personnel in order to minimize the potential of injury to my fellow workers.
- b. I am encouraged to inform my immediate supervisor of any hazards at the worksite without fear of reprisal, and that should my assistance create any such action or related intimidation, that I am encouraged to contact his/her supervisor or Safety Representative.

(b)(7)(C) (Signature of Employee) (b)(7)(C) (Signature of Supervisor)

06/20/2018 Date

Date 21-18

	Procedure Numbe	r: ISP-34	
Title: TRAINING OF SUBCONTRACTED SITE	Use Category: Reference		
SERVICES PERSONNEL	Revision: 14	Page: 19 of 25	

## EXHIBIT 8.3: READ AND SIGN SHEET

Document Title:	See At	ached	 
Holtec Procedure	No.:	1+5P-3	 14
Date: 06/20	2018	_	

My signature below acknowledges that I have completed the reading of the document above and fully understand its content and how it applies to the work that I will be completing for Holtec.

land		(b)(7)(C)		
Name 7	·		1-	
Signature 7	(b)(7)(C)			

Document Title	Holtec Procedure No.	Initials
Code of Safe Practices	HPP-2464-1050 (Exhibit 7.1)	(b)(7)(C)
Action Item Tracking & Resolution Training	Reference HPP-2464-1057	
Hand and Power Tool Read and Sign	NA	+
Hearing Protection Guidelines	NA	-
Heat Illness Training (Read and Sign for Supervisors)	Reference HPP-2464-620	
Job Safety Analysis	HPP-2464-607 Rev. 1	
Lead Safety Training	Reference HPP-2464-1056	+
Risk Management	Reference HPP-2464-1042	

1.1

HOLTEC	Procedure Numbe	HSP-34
TRAINING OF SUBCONTRACTED SITE	Use Category: Reference	
SERVICES PERSONNEL	Revision: 14	Page: 19 of 25

## EXHIBIT 8.3: READ AND SIGN SHEET

Document Title: <u>SEE ATTACHED</u>

Holtec Procedure No .: SEE ATTACHED

Revision: SEE ATTACHED

100

Date: 07/27/2018

My signature below acknowledges that I have completed the reading of the document above and fully understand its content and how it applies to the work that I will be completing for Holtec.

(b)(7)(C)		
Name		
	(b)(7)(C)	
Signatur		

# Holtec Safety Gap Training

# **Read and Sign Index**

Document Title	Document Number	Revision	Initials
Ladder and Stair Safety	HPP-2464-1038	1	(b)(7)(C)
Medical Emergencies & First Aide	HPP-2464-1046	2	
Personal Protective Equipment	HPP-2464-608	1	
Scaffold User Training	HPP-2464-1146	2	
Compressed Gas	HPP-2464-1049	(?)	
Electrical Safety	HPP-2464-612	Ý	
Fire Protection	HPP=2464-1039	2	
Fitness fr=or Duty	HPP-2464-1051	1	
Hearing Protection	HPP-2464-614	1	
Heat Illness Prevention	HPP-2464-620	1	
Hazard Communication Read & Sign	NA	NA	

OLTEC		Procedure Number	ISP-34
TRAINING OF SUBCONT	RACTED SITE	Use Category: Reference	
SERVICES PERS		Revision 14	Page: 17 of 25
Exhibit 8.1: Stan	dard Training Attenda	nce Sheet	
ropic: Stand Down			
Date: 8-10-18	Duration:	2 hours	5
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Topic:	Exhibit 8.1: <u>Stan</u> - <u> -                                 </u>	dard Training Attenda		
Date:	10/5/2017 (b)(7)(C)	Duration:	1.5 Hour	25
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TRAINING MODULE: Licensing

APPLICABLE LESSON PLAN: LP-HOL-02

INSTRUCTOR: (b)(7)(C)

DATE OF CLASSROOM TRAINING:

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(b)(7)(C)			
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TRAINING MODULE: Cask Overview

APPLICABLE LESSON PLAN: HOL-LP-01 (b)(4), (b)(7)(C)

**INSTRUCTOR:** 

i

DATE OF CLASSROOM TRAINING: 1/22/2018

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TRAINING MODULE: System Preparation

APPLICABLE LESSON PLAN- LP-HOL-03

**INSTRUCTOR:** 

DATE OF CLASSROOM TRAINING: 1/2-3 2018

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TRAINING MODULE: Lessons Learned

APPLICABLE LESSON PLAN: <u>LP-HOL-04</u> (b)(7)(C)

INSTRUCTOR:

DATE OF CLASSROOM TRAINING: 1/23/2018

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SERVICES PERSONNEL	Revision 12	Page 17 of 25
Exhibit 8.1: <u>Standard Training Attend</u> Topic: QAIndoctrination	lance Sheet	
(b)(7)(C)	: 2hrs	
Performed by	-	
(b)(7)(C)	Print Name	



## READ AND SIGN SHEET

Document Title: <u>*ROCESSING AND RESOLUTION OF CONCERNS*</u> Holtec Procedure No.: <u>*ASP-1016*</u> Revision: <u>0</u> Date: <u>*Q2-28-2018*</u>

My signature below acknowledges that I have completed the reading of the document above and fully understand its content and how it applies to the work that I will be completing for Holtec.

(b)(7)(C)	
Name	
(b)(7)(C)	
Signature	,, _,, _



### READ AND SIGN SHEET

(G 2-38-18 Document Title: HER IDISOF REPORTING OF DEFECTS PER IDLER A IDLER SO. 55 6 Holtec Procedure No.: HSP-101501 Revision: Date: 02-28-2018

My signature below acknowledges that I have completed the reading of the document above and fully understand its content and how it applies to the work that I will be completing for Holtec.

(b)(7)(C)		
Name		
Signature	(b)(7)(C)	

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SERVICES PERSON	NEL	Revision:	Page:			
		11	17 of 25			
Exhibit 8.1: <u>Standar</u>	d Training Attendan	ce Sheet				
Topic: LP-HOL-7 (Dry Cask Storage						
_Supervisor Training						
Date: 2/22/18	Duration:	344.				
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TRAINING OF SUBCONTRACTED SITE SERVICES PERSONNEL	Use Category Reference Revision Page 10 17 of 25
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Exhibit 8.1: <u>S</u>	Standard Training Attend		
Topic: DCSS Licens	ing UMAX	4	
- LP-HOL- UMA			
Date: 51.8/18	Duration	3.1/2 hr	5
Performed by: <sup>(b)(7)(C)</sup>			
Sign Name	Pr	int Name	

Reference         Revision         Image: 10         Topic         System Preparation ond hooding - OMAX         Date: Sign Name         Duration: 4hr-*         Sign Name	Invaluence       Reference         SERVICES PERSONNEL       Reference         Revision       Page         10       17 of 2         Exhibit 8.1: Standard Training Attendance Sheet         Topic:       System Preparation and hoading - OMAX             Date:           Duration:          Sign Name	HOLTEC			ISP-34
Exhibit 8.1: <u>Standard Training Attendance Sheet</u> Topic: <u>System Preparation and Loading - OMAX</u> <u>LP-HOL - COMAX - 003</u> Date: <u>Sislis</u> Duration: <u>4h-s</u> Sign Name	Exhibit 8.1: <u>Standard Training Attendance Sheet</u> Topic: <u>System Preparation and hoading - UMAX</u> <u>LP-HOL - UMAX - 003</u> Date: <u>Sign Name</u> Diration: <u>4h-</u>	TRAINING OF SUBCONTRAINING OF SUBCONTRAINING OF SUBCONTRAINING OF SUBCONTRAINING OF SUBCONTRAINING OF SUBCONTRA	ACTED SITE	Revision	Page
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Title	TRAINING OF SUBCONTRACTED SITE	Use Category Reference	
	SERVICES PERSONNEL	Revson 10	Page 17 of 25

## Exhibit 8 1: Standard Training Attendance Sheet

Date: <u>-18-18</u> Performed by:	Duration:	
Sign Name	Print Name	]
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HOLTEC					SP-34
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	SERVICES P	ERSONNEL		Revision: 14	Page: 17 of 25
	Exhibit 8.1	: Standard Train	ing Attendar	ice Sheet	
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Date: 08	- <b>28-16</b>		Duration:	415 min3	
Performed by					
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	Procedure Number	<sup>er:</sup> HSP-34
TRAINING OF SUBCONTRACTED SITE	Use Category.	eference
SERVICES PERSONNEL	Revision: 14	Page: 17 of 25

## Exhibit 8.1: Standard Training Attendance Sheet

Date: <u>08-29-18</u> (b)(7)(C)	Duration: 45 min'
Performed by:	
Sign Name	Print Name

Night Shift

HOL	
Title	

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### TRAINING OF SUBCONTRACTED SITE SERVICES PERSONNEL

7	Procedure Numbe	er
		HSP-34
	Use Category R	eference
	Revision 14	Page: 17 of 25

### Exhibit 8.1: Standard Training Attendance Sheet

Topic: LOAD HANDLING CONT	BOL FOR CRANE
Date:	Duration: 45 m.z.s
Sign Name	Print Name
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HOLTEC	Procedure Numbe	ISP-34
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SERVICES PERSONNEL	Revision. 14	Page 17 of 25

### Exhibit 8.1: Standard Training Attendance Sheet

Topic: LOAD HANDLING CONTROL FOR CRANE
BVCT OPERATIONS
Date: 08-28-18 Duration: 45 m.23
Performed by:
Sign Name Print Name
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TRAINING OF SUBCONTRACTED SITE SERVICES PERSONNEL       Reference         Revision       Page 10       17 of 25         Exhibit 8.1: Standard Training Attendance Sheet       10       17 of 25         Topic:       House Dcs       System Ref 3 LoAbsonder       10         Date:       OY-16-18       Duration:       16	TRAINING OF SUBCONTRACTED SITE       Reference         SERVICES PERSONNEL       Revision         Revision       Page         10       17 of 25         Exhibit 8.1: Standard Training Attendance Sheet         Topic:       House         House       Standard Training Attendance Sheet         Topic:       House         Date:       Outer18         Date:       Outer18         Duration:       Image: Ima	TRAINING OF SUBCONTRACTED SITE       Reference         SERVICES PERSONNEL.       Revision         Page       10         Topic:       Houtec         Montec       Standard Training Attendance Sheet         Topic:       Houtec         Date:       04-16-18         Date:       04-16-18         Duration:       he         Sign Name       Print Name	TRAINING OF SUBCONTRACTED SITE       Reference         SERVICES PERSONNEL.       Revision         Page       10         Topic:       Houtec         Montec       Standard Training Attendance Sheet         Topic:       Houtec         Date:       04-16-18         Date:       04-16-18         Duration:       he         Sign Name       Print Name				Use Catagory	SP-34
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VCT415-2	TYPE OF WORK: (Check all that apply) Maintenance Troubleshooting Repair	DOCUMENTATION: A Skill of the Craft Document Title / No.		DATE: START <u>10</u> /10/ <u>17</u> COMPLETE <u>10</u> /12/17
PROBLEM DESCRIPTION:		32 Hzs. (b)(7)(C)	2/18/18	
VORK PERFORMED:		CASK LOADING SUPE DIRECTING WORK:	CRVISOR (CLS)	
IATERIALS USED: See 1,3+	abone		M&TE USED:	
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## Minor Maintenance, Troubleshooting and Repair Log

COMPONENT/ITEM: VCT415-5	TYPE OF WORK: (Check all that apply) Maintenance Troubleshooting Repair	DOCUMENTATION: A Skill of the Craft Document Title / No.	DATE: START 10 /10 /17 COMPLETE 10 /12 /17
PROBLEM DESCRIPTION:	P.M @ 11	12 HZS. (b)(7)(C) 2/18/	1K
Дhnu	al P.M @ 11	- nr.s	
WORK PERFORMED:	and the second	CASK LOADING SUPERVISOR DIRECTING WORK: [b)(7)(C)	(CLS)
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MATERIALS USED: See 1,3+	and the second sec		M&TE USED:
TESTING PERFORMED:			
COMPLETED STATUS:	complete		



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Procedure Number:	Revision:
HPP-2464-82	10
Page	
34 of	35

### Exhibit 8.5 Initial Pre – Job Brief Meeting

Work Plan No.: U2 - M	2-16-400	Date:	8-3-18
Briefing Conducted By:	(b)(7)(C)		]

PRINT	SIGNATURE	INITIALS	POSITION
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Safety | Stewardship | Engagement

# Decommissioning San Onofre

**Nuclear Generating Station** 

# **Decommissioning Agent** (DA) Training

**MPC Pre-Operation Inspection** 

**Presented By:** HOLTEC



# **Ground Rules**

Return from breaks on time







Pagers and phones on silent mode

Practice good housekeeping



Phone calls, texting, and messages only on breaks, unless it is an emergency

Know your fire escape plan

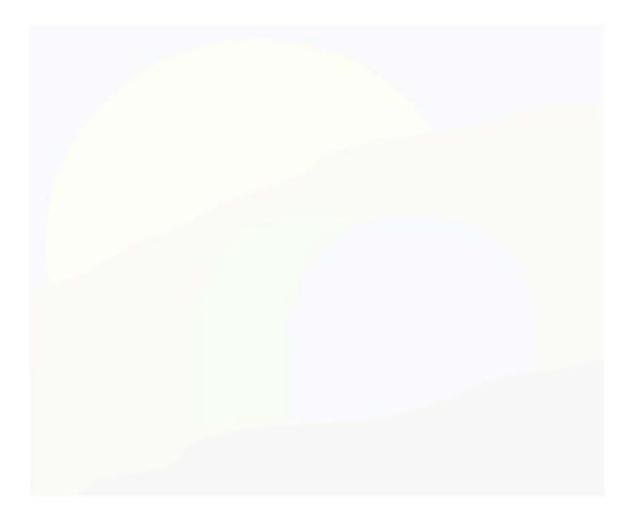


**Sign Attendance Sheet** 



Decommissioning San Onofre Nuclear Generating Station

# **Safety Break**





# **Objectives**

- MPC Pre-Operation Inspection Procedure
  - Introduction
  - Limitations/Precautions
  - Procedure
    - Stage MPC lid and MPC Shell
    - Inspect MPC lid and closure ring
    - MPC lid and drain line fit-up
    - Inspect HI-TRAC
  - Oversight opportunities





Decommissioning San Onofre Nuclear Generating Station

(b)(4)

# Introduction

HPP-2464-100 (MPC-Pre-operation Procedure)







Decommissioning San Onofre Nuclear Generating Station

# (b)(4)

**Precautions** 





Decommissioning San Onofre Nuclear Generating Station

# (b)(4)

**Precautions** 





Decommissioning San Onofre Nuclear Generating Station

# (b)(4)

**Precautions** 





Decommissioning San Onofre Nuclear Generating Station

# Stage MPC Shell and Lid

(b)(4)







Decommissioning San Onofre Nuclear Generating Station

(b)(4)

# **INSPECT the MPC**





Decommissioning San Onofre Nuclear Generating Station

# (b)(4)

**INSPECT** the MPC Lid and

**Closure Ring** 





Decommissioning San Onofre Nuclear Generating Station

(b)(4)



**MPC lid punch mark layout** 





Decommissioning San Onofre Nuclear Generating Station

(b)(4)

# Vent port plug and cover plate fit-up



## **MPC INSPECTION & PREPARATION**

## Drain line inspection

**TP-HOL-UMAX-003** 

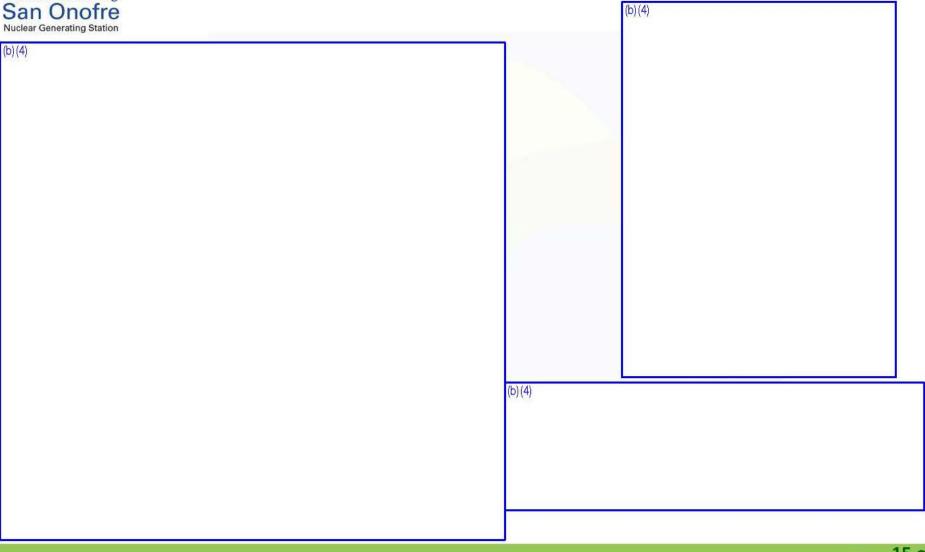


14 of 24 SOUTHERN CALIFORNIA EDISON An EDISON INFERNATIONAL® Company





# **Drain Line Length Check**







Decommissioning San Onofre Nuclear Generating Station

# Damaged Fuel Container Installation







Decommissioning San Onofre Nuclear Generating Station

# **MPC Lid Fit Test**







Decommissioning San Onofre Nuclear Generating Station

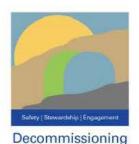
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**MPC Lid Fit Test** 



HOLTEC INTERNATIONAL	HI-TRAC VW Transfer Cask Materials	
(0)(4)		
TP-HI-UMAX-	001	<b>19 of 2</b> Holtec Proprietary



San Onofre Nuclear Generating Station

# **HI-TRAC Prep & Inspection**

Why?

# Inspection of :





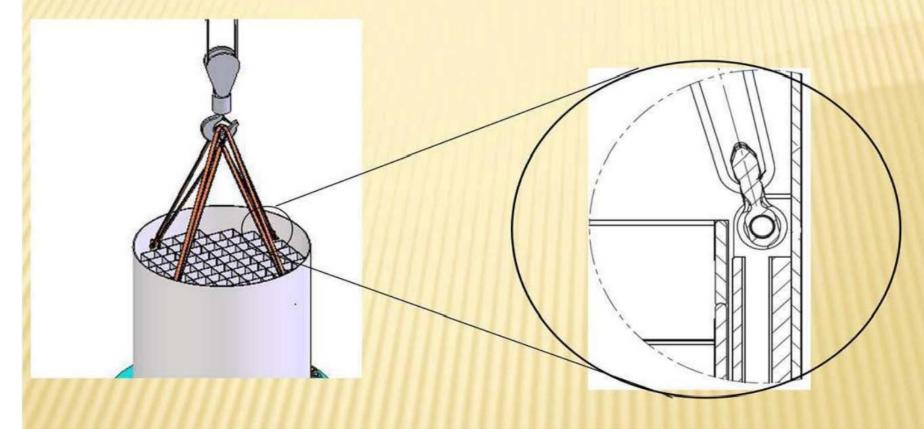
Decommissioning San Onofre Nuclear Generating Station



**Inspect HI-TRAC Bottom Lid** 



### Empty MPC Placement in HI-TRAC





### **EMPTY MPC PLACEMENT IN HI-TRAC**

### What do we need to be wary of?

**TP-HOL-UMAX-003** 





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### We Are In This Together Your Feedback Is Welcome

Questions

24 of 24



Safety | Stewardship | Engagement

## Decommissioning San Onofre

**Nuclear Generating Station** 

### **Decommissioning Agent** (DA) Training

**MPC** Loading

**Presented By:** HOLTEC



## **Ground Rules**

Return from breaks on time







Pagers and phones on silent mode

Practice good housekeeping



Phone calls, texting, and messages only on breaks, unless it is an emergency

Know your fire escape plan



**Sign Attendance Sheet** 

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Decommissioning San Onofre Nuclear Generating Station

# **Safety Break**





# **Objectives**

- Introduction
- Limitations/Precautions
- Procedure
  - Drain HI-TRAC water jacket
  - Fill MPC with water
  - Install annulus seal
  - Move HI-TRAC/MPC from CWA to CLA
  - Install drain line and MPC lid
  - Remove MPC to CWA
  - Lower water level in HI-TRAC
- Oversight opportunities





Decommissioning San Onofre Nuclear Generating Station

(b) (4)

### Introduction

### HPP-2464-200 (MPC Loading)





Decommissioning San Onofre Nuclear Generating Station

# (b)(4)

**Precautions** 





Decommissioning San Onofre Nuclear Generating Station

(b)(4)









Decommissioning San Onofre Nuclear Generating Station

# (b)(4)







Decommissioning San Onofre Nuclear Generating Station

(b)(4)





Decommissioning San Onofre Nuclear Generating Station

# (b)(4)

**Precautions** 





Decommissioning San Onofre Nuclear Generating Station

(b)(4)







Decommissioning San Onofre Nuclear Generating Station

(b)(4)







Decommissioning San Onofre Nuclear Generating Station

(b) (4)







Decommissioning San Onofre Nuclear Generating Station

(b)(4)







Decommissioning San Onofre Nuclear Generating Station







Decommissioning San Onofre Nuclear Generating Station







Decommissioning San Onofre Nuclear Generating Station







Decommissioning San Onofre Nuclear Generating Station

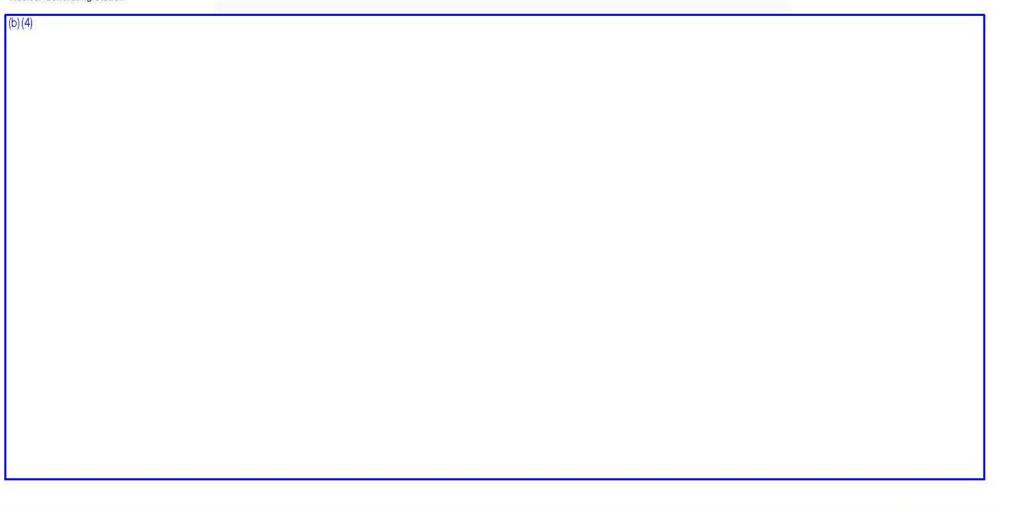








Decommissioning San Onofre Nuclear Generating Station



**Procedure** 





Decommissioning San Onofre Nuclear Generating Station

(b)(4)

# Things to Consider When Filling MPC with Water







### LCO 3.3.1 Boron Concentration

LCO 3.3.1 The concentration of boron in the water in the MPC shall meet the following limits for the applicable MPC model and the most limiting fuel assembly array/class to be stored in the MPC:

MPC-37: Minimum soluble boron concentration as required by the table below<sup>†</sup>.

Array/Class	All Undamaged Fuel Assemblies		One or more Damaged Fuel Assemblies or Fuel Debris	
	Maximum Initial Enrichment ≤ 4.0 wt% <sup>235</sup> U (ppmb)	Maximum Initial Enrichment 5.0 wt% <sup>235</sup> U (ppmb)	Maximum Initial Enrichment ≤ 4.0 wt% <sup>235</sup> U (ppmb)	Maximum Initial Enrichment 5.0 wt% <sup>235</sup> U (ppmb)
All 14x14 and 16x16	1000	1500++	1300	1800
All 15x15 and 17x17	1500	2000	1800	2300

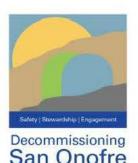
- <sup>†</sup> For maximum initial enrichments between 4.0 wt% and 5.0 wt% <sup>235</sup>U, the minimum soluble boron concentration may be determined by linear interpolation between the minimum soluble boron concentrations at 4.0 wt% and 5.0 wt%.
- If any undamaged fuel assemblies are stored in DFCs the minimum soluble boron concentration is 1600 ppmb.

APPLICABILITY: During PWR fuel LOADING OPERATIONS with fuel and water in the MPC

### AND

During PWR fuel UNLOADING OPERATIONS with fuel and water in the MPC.

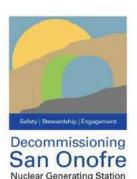




# LCO 3.3.1 Boron Concentration

- Boron concentration not within limit
  - Suspend LOADING OPERATIONS or UNLOADING OPERATIONS, immediately AND
  - Suspend positive reactivity additions, immediately AND
  - Initiate action to restore boron concentration to within limit, immediately

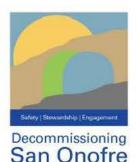




# LCO 3.3.1 Boron Concentration

- SR 3.3.1.1: Verify boron concentration is within the applicable limit using two independent measurements
  - Within 4 hours prior to the Applicability of this LCO AND
  - Every 48 hours thereafter
  - Applicable when MPC is submerged in water or if water is to be added to, or recirculated through the MPC





Nuclear Generating Station

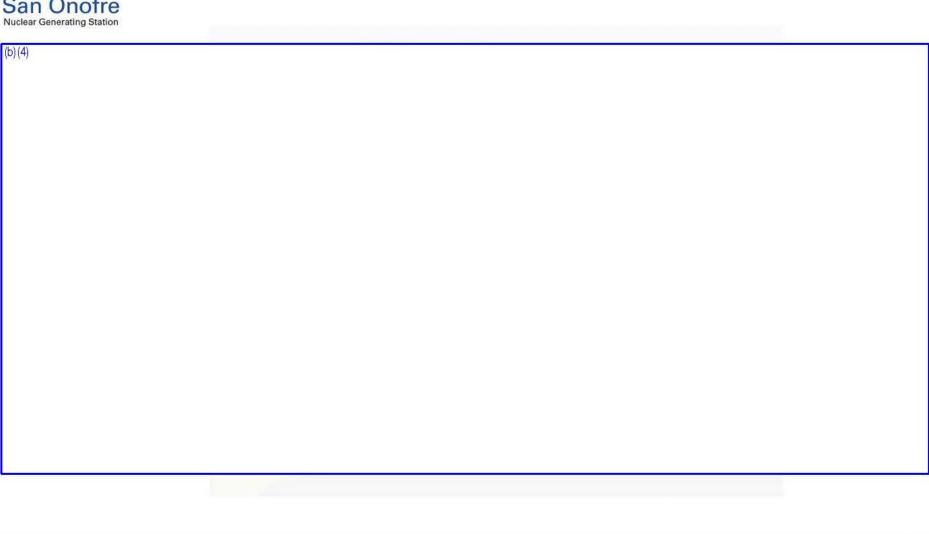
# Procedure

 The Annulus Overpressure (b)(4) System is used to provide further protection against MPC external contamination during in-pool operations. (b)(4)





Decommissioning San Onofre Nuclear Generating Station



**Annulus Filling** 





Decommissioning San Onofre Nuclear Generating Station



**Procedure** 





Decommissioning San Onofre Nuclear Generating Station

(b)(4)

## **Procedure**



### HI-TRAC PLACEMENT INTO CASK PIT



**TP-HOL-UMAX-003** 

Decommissioning San Onofre Nuclear Generating Station Safety | Stewardship | Engagement



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Decommissioning San Onofre Nuclear Generating Station

**Procedure** 





Decommissioning San Onofre Nuclear Generating Station



**Procedure** 





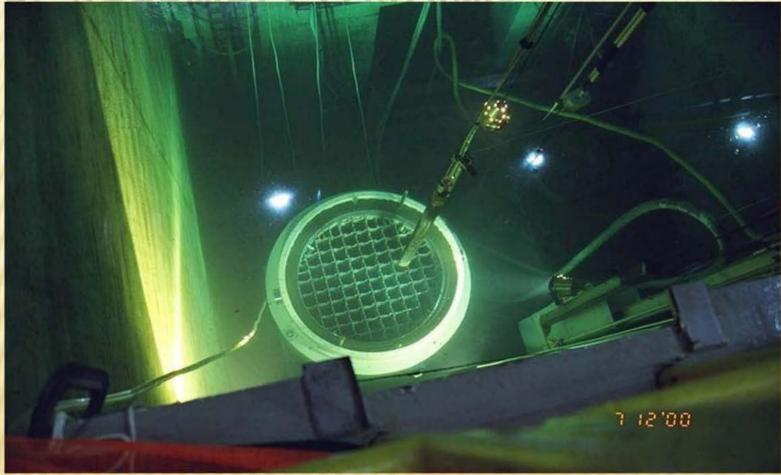
Decommissioning San Onofre Nuclear Generating Station

# (b)(4)

**Procedure** 



### FUEL ASSEMBLY LOADING



**TP-HOL-UMAX-003** 



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Decommissioning San Onofre Nuclear Generating Station

#### **Procedure**







Decommissioning San Onofre Nuclear Generating Station

(b)(4)





#### **Procedure**



Decommissioning San Onofre Nuclear Generating Station

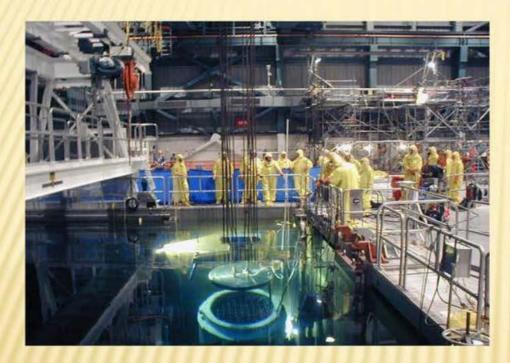
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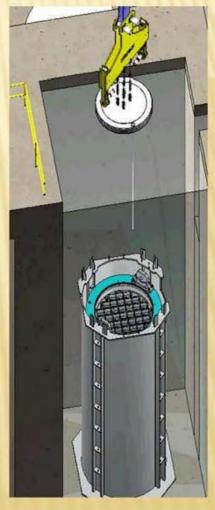
**Procedure** 

Decommissioning San Onofre Nuclear Generating Station Safety | Stewardship | Engagement



#### INSTALLATION OF THE MPC LID AFTER FUEL LOADING COMPLETE





Remember that the Time to Boil commences when lid is placed!

HI-TRAC shown in a VECASP



Decommissioning San Onofre Nuclear Generating Station Safety | Stewardship | Engagement

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#### INSTALLATION OF MPC LID AFTER FUEL LOADING IS COMPLETE

#### Bent drain tube at Hope Creek —



**TP-HOL-UMAX-003** 

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#### **MPC Time-To-Boil Contingency**

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**Procedure** 







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#### **Procedure**

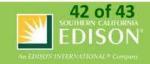


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#### **Procedure**

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#### Decommissioning San Onofre Nuclear Generating Station

Decommissioning Agent (DA) Training

**MPC Transfer** 

Presented By: HOLTEC





#### **Ground Rules**

Return from breaks on time







Pagers and phones on silent mode

Practice good housekeeping



Phone calls, texting, and messages only on breaks, unless it is an emergency

Know your fire escape plan

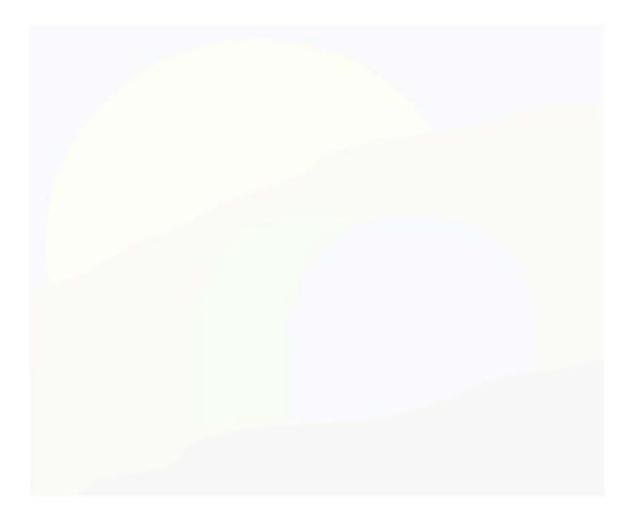


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# **Safety Break**





# **Objectives**

- Introduction
- Limitations/Precautions
- Procedural steps
- Oversight opportunities





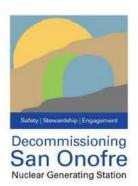
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#### Introduction

#### HPP-2464-400 (MPC Transfer)

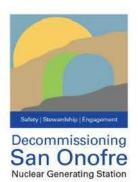






- The MPC transfer shall not occur if the meteorological forecast indicates a credible chance of adverse weather activity.
- FSAR (HI-STORM UMAX CANISTER STORAGE SYSTEM) – General procedural requirement specified in FSAR. Minimize rain intrusion into UMAX VVM.





- The HI-STORM UMAX lid shall be preferably kept less than 2 feet above the top surface of the VVM while over the MPC.
  - This lift limit action is purely a defense in-depth measure because the Closure Lid cannot fall and impact the MPC because of geometric constraints





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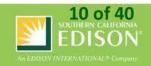




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#### **Precautions**

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- For short term transport operations, the minimum and maximum ambient temperatures are 0°F and 90°F respectively.
  - UMAX FSAR Table 2.3.6 Environmental Parameters used in thermal basis for HI-TRAC VW Transfer Cask.





Decommissioning San Onofre Nuclear Generating Station

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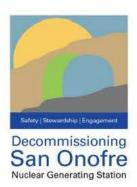
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**Precautions** 

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- Per UMAX FSAR, the minimum permissible temperature limit during closure lid handling operations of 10°F must not be violated by checking forecasted temperature.
- UMAX FSAR (ANSI/ANS 57.9) Table 2.3.1
   Normal design event condition parameter





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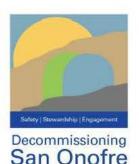




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Nuclear Generating Station

# Procedure

- Prepare HI-TRAC for Transfer:
  - Verify COC surveillance and TS requirements met
    - CoC SR 3.2.1.1, HI-TRAC VW Contamination Survey, prior to entering applicability of CoC TS LCO 3.2.1.
    - CoC TS 5.3, HI-TRAC VW Surface Dose Rates
  - Previously verified:
    - CoC SR 3.1.1.1 (MPC cavity drying with FHD)
    - CoC SR 3.1.1.2 (Helium backfill pressure)
    - CoC SR 3.1.1.3 (Helium leak rate of vent and drain port cover plates)

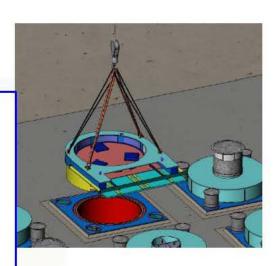




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#### **Procedure**



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#### **Procedure**



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#### Procedure



 VCT Stability analysis (HI-2156626) requires a minimum distance of 47" including a safety factor of 2 to ensure VCT will not slide of ISFSI ramp





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### **Procedure**

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Decommissioning San Onofre Nuclear Generating Station

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## **Operating Experience**



Decommissioning San Onofre Nuclear Generating Station

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## **Operating Experience**





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# **Operating Experience**



### FINAL MOVEMENTS



Ensure that HHP is clear of vehicles and combustibles.

Ensure that VCT has enough diesel fuel.

Ensure that head sets are available for VCT operator and spotters.

Ensure security is prepared.

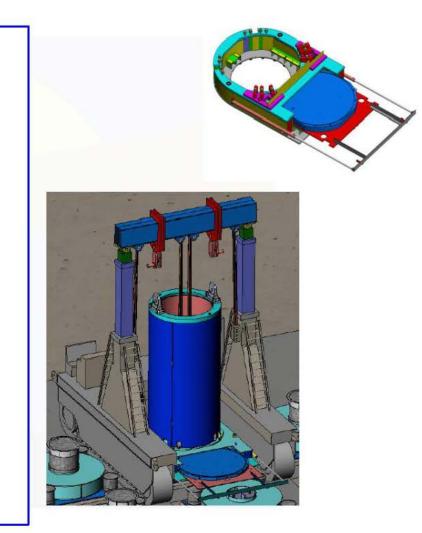
Ensure RP has the area posted.





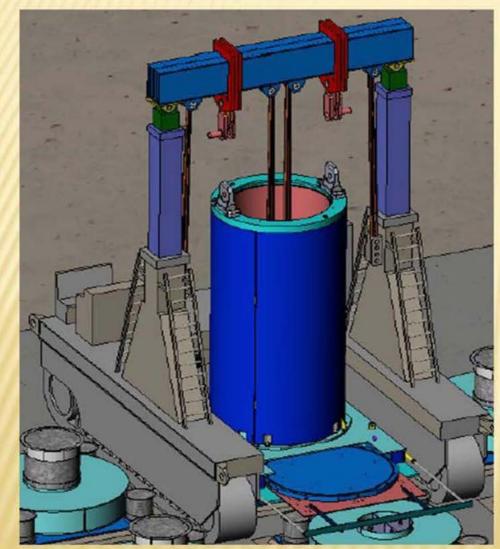
Decommissioning San Onofre







### MPC TRANSFER



After transfer, things to watch out for are...

- •Clean and contaminated sections of the HI-TRAC pool lid
- Don't cross contaminate

•Locked high rad is now created as there are high doses in CEC annulus

•MPC at a high temperature as well as lift cleats





Decommissioning San Onofre Nuclear Generating Station

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**Procedure** 





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Procedure

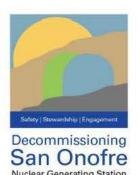


Decommissioning San Onofre Nuclear Generating Station

### Procedure



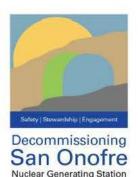






- The Spent Fuel Storage Cask (SFSC) heat removal system shall be operable (when 50% or more of the inlet vent duct areas are unblocked and available for flow or when air temp. requirements are met).
- Heat removal system operable, but partially (< 50%) blocked.
  - Restore SFSC heat removal system to operable status by removing blockage (no completion time limit)
- SFSC Heat removal system inoperable.
  - Restore SFSC heat removal system to operable status within 8 hours.



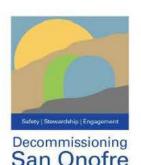




The Spent Fuel Storage Cask (SFSC) heat removal system shall be operable.

- Required Actions B.1 and associated Completion Times not met.
  - Measure SFSC dose rates in accordance with RP Program immediately and once per 12 hrs thereafter AND
  - Restore SFSC heat removal system to operable status within 24 hours OR
  - Transfer the MPC into a Transfer Cask (HI-TRAC) within 24 hours.





Nuclear Generating Station

# Surveillance Requirement

- SR 3.1.2
  - Verify that all VVM inlet and outlet duct screens are free of blockage from solid debris or floodwater every 24 hours OR
  - For VVMs with installed temperature monitoring equipment, verify that the difference between the average VVM air outlet duct temperature and ISFSI ambient temperature is ≤ 80°F for VVMS containing MPC37s.







- Removable contamination on the exterior surfaces of the TRANSFER CASK and accessible portions of the MPC shall each not exceed:
  - a. 1000 dpm/100 cm2from beta and gamma sources
  - b. 20 dpm/100 cm2from alpha sources
- TRANSFER CASK or MPC removable surface contamination limits not met.
  - Restore removable surface contamination to within limits within 7 days.
- Surveillance Requirements:
  - Verify that the removable contamination on the exterior surfaces of the TRANSFER CASK and accessible portions of the MPC containing fuel is within limits, once prior to TRANSPORT OPERATIONS



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### Decommissioning San Onofre

**Nuclear Generating Station** 

### **Decommissioning Agent** (DA) Training

**MPC** Sealing

Presented By: HOLTEC



### **Ground Rules**

Return from breaks on time







Pagers and phones on silent mode

Practice good housekeeping



Phone calls, texting, and messages only on breaks, unless it is an emergency

Know your fire escape plan



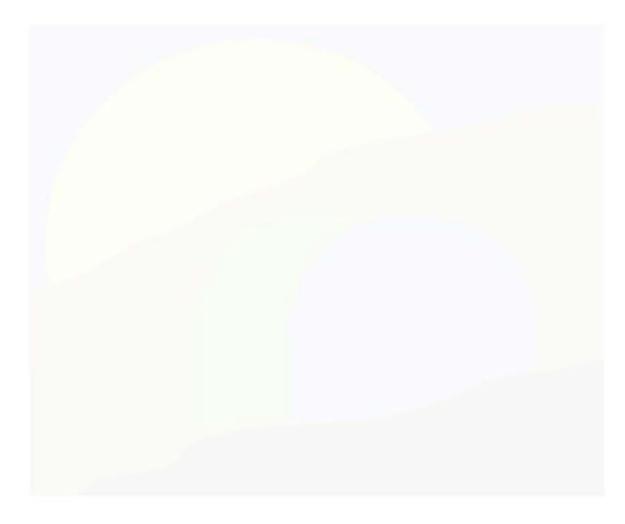
**Sign Attendance Sheet** 

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Decommissioning San Onofre Nuclear Generating Station

## **Safety Break**





## **Objectives**

- Introduction
- Limitations/Precautions
- Procedure
  - Set-up Argon Purge
  - MPC lid to shell welding
  - RVOA Installation
  - Hydrostatic Test with FHD
  - FHD set-up
  - Phase 1 and Phase 2 FHD operations
  - FHD system shutdown
  - Remove RVOA's
  - Torque Drain/Vent Port plugs
  - MPC port cover plate welding and NDE inspections
  - Helium leak test of cover plate welds
- Oversight opportunities





Decommissioning San Onofre Nuclear Generating Station

### Introduction

### HPP-2464-300 (MPC Sealing)







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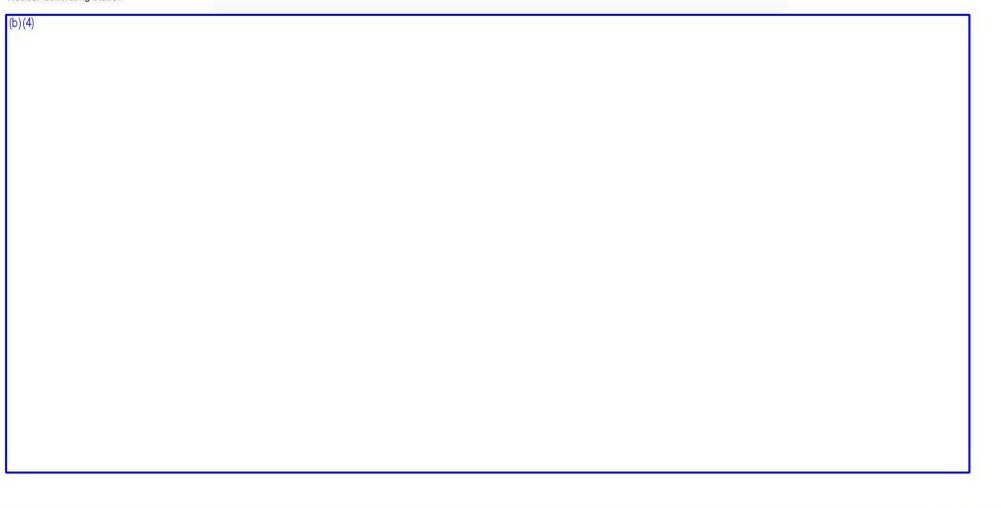
Decommissioning San Onofre Nuclear Generating Station



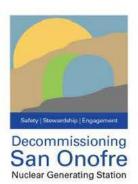




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- FHD Main Skid will reject a maximum of 230,000 BTU/hr of heat to the surrounding air through the air-cooled condenser.
- FHD Chiller Skid will reject approximately 100,000 BTU/hr for a period of approximately 2 hours maximum.
  - FHD ancillary equipment requires manual ventilation in the area to be sufficient to support this heat load.





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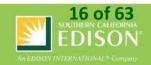




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**Precautions** 





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### **Precautions**







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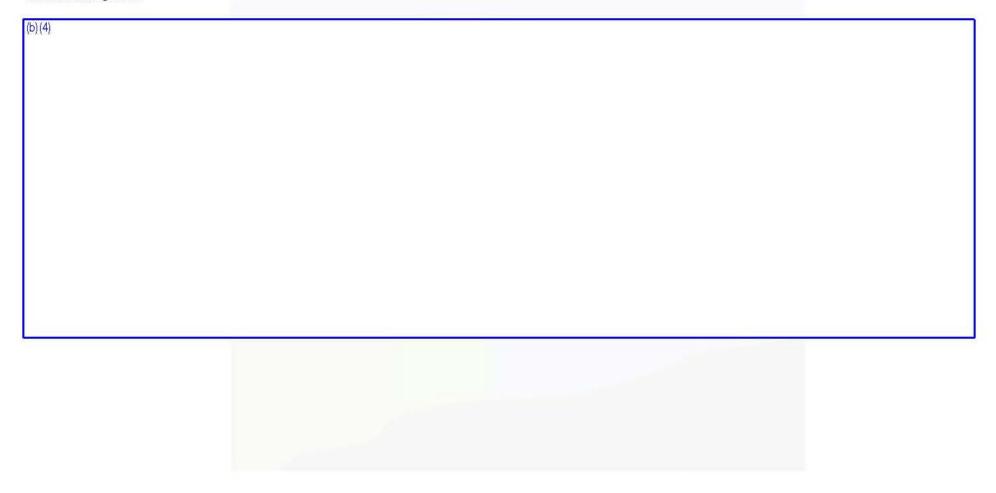
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**Precautions** 





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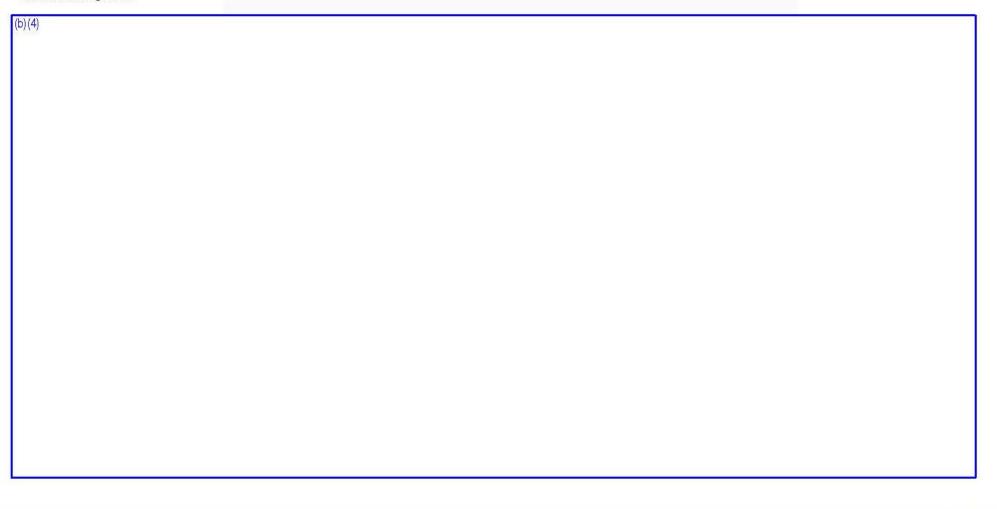
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**Procedure** 





Decommissioning San Onofre Nuclear Generating Station



**Procedure** 





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#### Procedure





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## MPC Containment Boundary Examinations

**MPC Confinement Boundary Examinations** 

#### Weld Location

NDE Requirement

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#### **MPC Welding Operations**

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**Procedure** 





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#### **Hydrostatic Test**







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## **Oversight Opportunities**

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**HI-TRAC/MPC** Preparation for SEALING





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**Procedure** 





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#### **FHD Safe Operation**



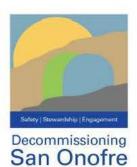


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Nuclear Generating Station

## The Science of FHD

- An FHD is a <u>Forced Helium Dehydrator</u>.
  - The FHD is a skid-mounted closed loop dehydration system used to remove residual water from the MPC.

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## The Science of FHD

- All of the water that can be practically removed from the MPC is blown out thru the drain line.
  - FHD accomplishes this using helium gas (99.995% grade He) for all operations
  - Residual water remains on the MPC bottom as well as a remaining adherent amount on all wetted surfaces (fuel, MPC shell, MPC basket)
- The FHD removes further water from the MPC by a process of evaporation, boiling, and demoisturizing of the circulating gas stream.





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The Science of FHD

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#### The Science of FHD

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#### The Science of FHD

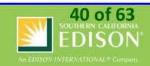




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#### **Dew Point Sensor**





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#### The Science of FHD





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#### **FHD Panel**







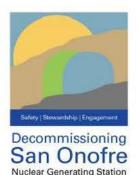
Nuclear Generating Station

## **Helium Circulator Module**

Helium Circulator Module

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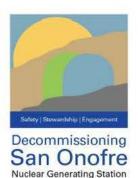




#### **Pre-heater Module**

- Pre-heater Module
  - Electrical process heater
  - Adds supplemental heat energy to helium gas
  - Works with existing heat of stored fuel in the MPC to overcome the heat lost through the sides of the HI-TRAC and top of the MPC
  - Heats the helium prior to entering the MPC to ensure the helium gas is heated and dry prior to re-entry into MPC cavity





## **Condensing Unit**

- Condensing Unit
  - Uses an air-cooled condenser
  - Serves to cool the helium/vapor mixture exiting the MPC to well below the dew point based on system operating pressure
    - Facilitates the extraction of water from the helium stream via condensation





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#### **Demoisturizer Module**

Demoisturizer Module

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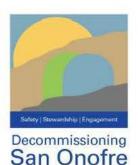


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#### FHD System Operating Conditions





Nuclear Generating Station

#### Key Safety Interlocks for FHD

The following interlocks provide an additional level of safety for FHD operations:





Nuclear Generating Station

#### Key Safety Interlocks for FHD

 These additional interlocks provide also add to the level of safety for FHD operations:

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**Procedure** 

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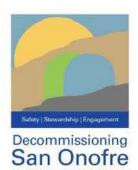


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**Procedure** 







- Table 3-1 provides decay heat and burnup limits for forced helium dehydration (FHD)
- MPC de-moisturizer exit gas temperature limit not met.
  - Must perform an engineering evaluation to determine quantity of moisture left in MPC. Evaluation must be complete within 7 days AND
  - Develop and initiate corrective actions necessary to return the MPC to compliance with Table 3-1. Corrective actions completed within 30 days.







- MPC helium backfill limit not met
  - Perform an engineering evaluation to determine the impact of helium differential.
     Evaluation must be completed within 72 hours

#### AND

 Develop and initiate corrective actions necessary to return to MPC to an analyzed condition by adding helium to or removing helium from the MPC.
 Evaluation must be complete with 14 days.

#### OR

 Develop and initiate corrective actions necessary to demonstrate through analysis, using the models and methods from the HISTORM UMAX FSAR, that all limits for MPC components and contents will be met. Evaluation must be complete within 14 days.





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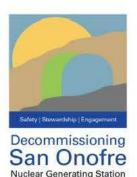


- MPC helium leak rate limit for vent and drain port cover plate welds not met
  - Perform an engineering evaluation to determine the impact of increased helium leak rate on heat removal capability and offsite dose. Evaluation must be completed within 24 hours.

#### AND

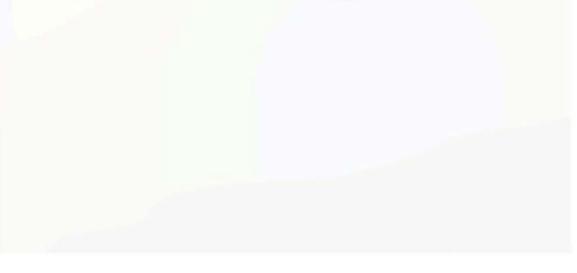
 Develop and initiate corrective actions necessary to return the MPC to compliance with SR 3.1.1.3. Corrective actions must be completed within 7 days.



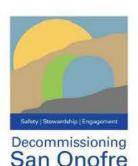




- Required Actions and associated Completion Times not met:
  - Remove all fuel assemblies from the SFSC.
  - Corrective action must be completed within 30 days.







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#### Surveillance Requirement (SR)

- SR 3.1.1.1
  - Verify MPC cavity has been dried in accordance with the applicable limits in Table 3-1.
  - Must be completed once prior to TRANSPORT OPERATIONS.

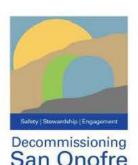




## Surveillance Requirement (SR)

- SR 3.1.1.2
  - Verify MPC helium backfill quantity is within limits specified in Table 3-2 for the applicable MPC model.
  - Must be completed once prior to TRANSPORT OPERATIONS.



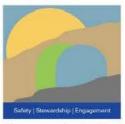


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# Surveillance Requirement (SR)

- SR 3.1.1.3
  - Verify that the total helium leak rate through the MPC vent & drain port confinement meets the leak tight criteria of ANSI N14.5 1997 which is ≤ 1.0E-07 atm-cc/sec (He).
- Must be completed once prior to TRANSPORT OPERATIONS





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**Procedure** 





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# **Operating Experience**

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# **Operating Experience**

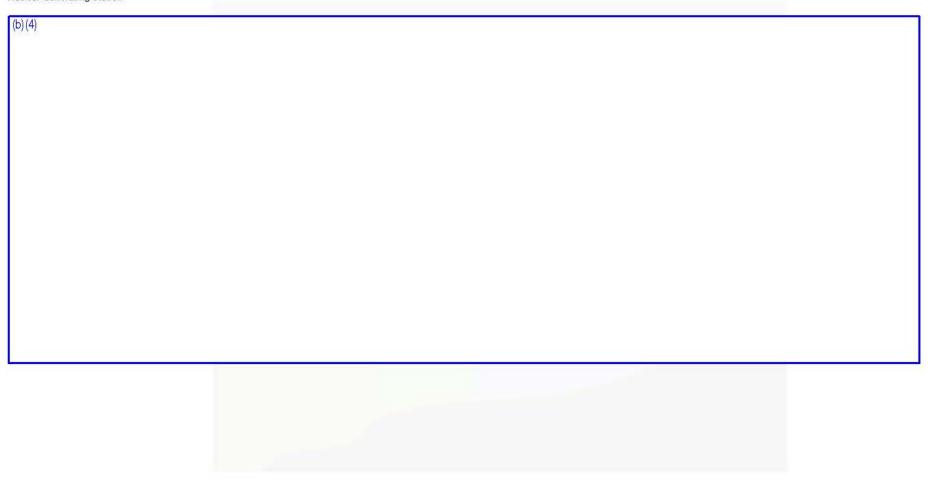
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# MPC port cover plate welding



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#### Decommissioning San Onofre Nuclear Generating Station

Decommissioning Agent (DA) Training

> Responding to Abnormal Conditions

Presented By: HOLTEC



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## **Ground Rules**

Return from breaks on time







Pagers and phones on silent mode

Practice good housekeeping



Phone calls, texting, and messages only on breaks, unless it is an emergency

Know your fire escape plan



**Sign Attendance Sheet** 



Decommissioning San Onofre Nuclear Generating Station

# **Safety Break**





# **Objectives**

- **Responding to Abnormal Conditions** 
  - Introduction
  - Responsibilities
  - Discuss instructions for the following events: •
    - MPC Damage
    - Forced Helium Dehydrator (FHD) Malfunction or Failure
      Building Crane Malfunction or Failure
      Multi-Purpose Pump malfunction or failure

    - Miscellaneous Equipment Gauge Malfunction
      Vertical Cask Transporter (VCT) Malfunction or Failure
      HI-PORT malfunction or failure

    - Welding Equipment Malfunction or Failure
    - Remote Valve Operating Assembly (RVOA) Malfunction or Failure
    - Recovery from Port Plug Assembly Leakage Problem

    - Contingency Actions for Krypton Burst
      Contingency Actions for Loss of Ventilation during FHD Operations
    - Lift Yoke Air Supply Malfunction





Decommissioning San Onofre Nuclear Generating Station

## Introduction

#### HPP-2464-600 (Responding to Anomalies)







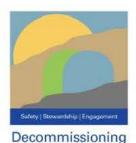


# **Responsibilities**

#### Holtec Project Manager:







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# **General Response Actions**

General actions for each anomaly include:







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# **MPC Damage**

### MPC Damage

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**FHD Malfunction or Failure** 





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**FHD Malfunction or Failure** 





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## **Building Crane Malfunction**

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**Miscellaneous** 





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**VCT Malfunction or Failure** 





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# **RVOA Malfunction**







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# **Port Plug Leakage**

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Decommissioning San Onofre Nuclear Generating Station



**Krypton Burst** 





Decommissioning San Onofre Nuclear Generating Station

(b)(4)

# Loss of Ventilation during FHD Operations







Decommissioning San Onofre Nuclear Generating Station

(b)(4)

# Lift Yoke Air Supply Malfunction



#### We Are In This Together Your Feedback Is Welcome

Questions

19 of 19



Safety | Stewardship | Engagement

#### Decommissioning San Onofre

Nuclear Generating Station

#### Decommissioning Agent (DA) Training

#### GMDO Oversight Briefing

**Presented By:** 

b)(7)(C)

Decommissioning San Onofre Nuclear Generating Station Safety | Stewardship | Engagement





- Discuss why we are here and how did we get here
- Significance of Oversight Specialist training & qualification
  - A review of the process
- Understand Oversight Expectations
   The Value of Oversight What is High Value
- Oversight Role Behaviors "what good looks like"
  - In the field
  - Internal to DA Oversight •
  - Writing and delivering of comments to HOLTEC
- Discuss what is working, and what is not working





Decommissioning San Onofre Nuclear Generating Station **Cold and Dark Oversight** 

(b) (4)





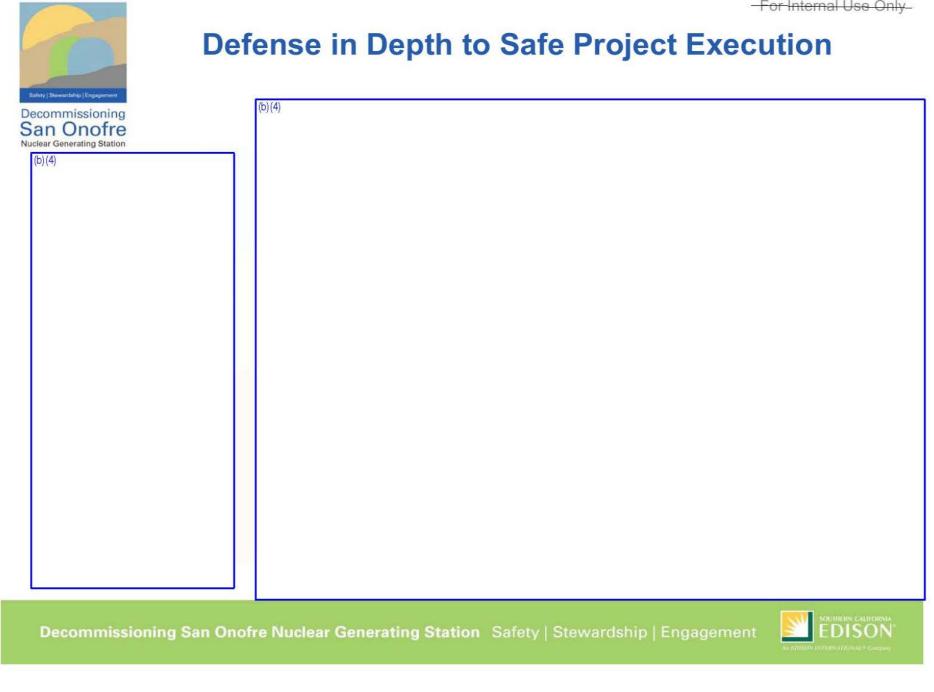


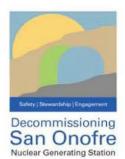
San Onofre Nuclear Generating Station **Oversight Specialist Qualification** 

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#### **High-Value Comments**

(b)(4)

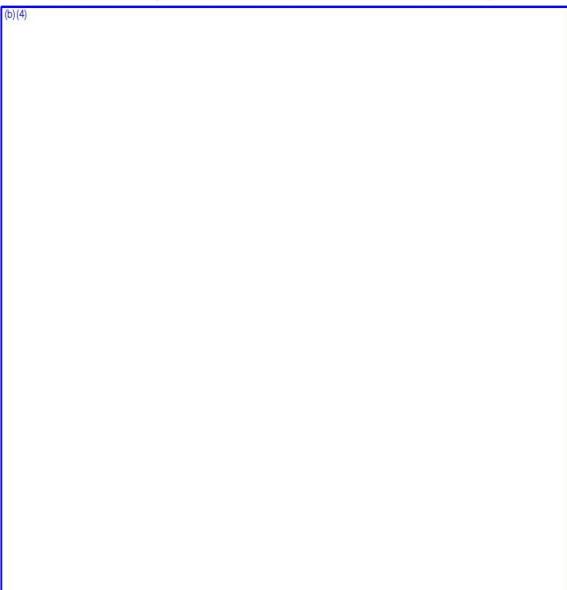




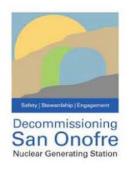
Decommissioning San Onofre Nuclear Generating Station

#### Holtec Oversight Comment Value and Characteristic Analysis









#### **GMDO Comments & Expectations**

- What do I need from our Team?
- How do we deliver value to our stakeholders?
- Why is this important to you?





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## Decommissioning San Onofre

Nuclear Generating Station

**Decommissioning Agent** (DA) Training

**Oversight Behaviors** 

**Presented By:** 

(b)(7)(C)

Decommissioning San Onofre Nuclear Generating Station Safety | Stewardship | Engagement



#### **Ground Rules**

Return from breaks on time







Pagers and phones on silent mode

Practice good housekeeping



Phone calls, texting, and messages only on breaks, unless it is an emergency

Know your fire escape plan



**Sign Attendance Sheet** 

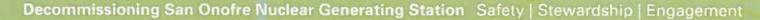
2 of 17



Decommissioning San Onofre Nuclear Generating Station

## **Safety Break**

- Who is CPR qualified/basic first aid qualified?
- Emergency Response Number is x86911
- Who will meet emergency response personnel?





4 of 17



- Establish an understanding of the Foundation of Oversight Behaviors & Oversight Role
- Understand Defense in Depth to Safe Project Execution
- Understand Key Oversight Expectations
- Oversight Role Behaviors "what good looks like"
  - In the field
  - Internal to DA Oversight
  - Writing and delivering of comments to HOLTEC
  - Responding to representatives from external Agencies

5 of 17



## **Foundation of Oversight Behaviors**

Foundational to Oversight Behaviors is the understanding of the importance of the role and the foundation of it's authority.

- Snyder v. SCE 1955
  - Contractor installed utility pole failed causing personal injury
  - SCE Inspector (Oversight) did not ensure pole installed to requirement. (6 <sup>1</sup>/<sub>2</sub> feet deep)
  - Regardless of whether the work is performed by the utility or an independent contractor it hires.

6 of 17



## **Foundation of Oversight Behaviors**

Decommissioning San Onofre Nuclear Generating Station

Other examples in California:

- Kern Power Plant
  - Worker fatally injured dismantling tank
  - Public injured during explosives demolition of major structure
- Huntington Beach Vault Explosion
  - Electrical subcontractor killed removing component
- CPUC-SED levied fines and other actions
- Civil lawsuits pending
- Snyder v. SCE case law cited here and across US

For Internal Use Only **Defense in Depth to Safe Project Execution** (b)(4) Decommissioning San Onofre Nuclear Generating Station (b)(4) 7 of 17 EDISON Decommissioning San Onofre Nuclear Generating Station Safety | Stewardship | Engagement

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## **Performing A Good Observation**

Decommissioning San Onofre Nuclear Generating Station





### Stay in the Green

#### WHY IMPORTANT:

To focus attention on how to effectively interact with the Contractor and peers to ensure the following:

Safety Adherence - Compliance with Requirements - Financial Stewardship

#### When:

Apply guidelines whenever interacting with the Contractor or your peers.

#### How:

Apply hierarchal order and general rules of influence during interactions:

1. Referent	Power of Soft-Skills (5 E's):
	Ethical, Engaging, Empowering, Example Setting, Empathy
2. Expert	Subject matter expertise — thorough understanding of OE, best practice, rules, procedures, and processes
3. Reward	Convey your gratitude for support, and keep energy positive, value the opinion of others, SMILE.
4. Legitimate	Authority derived by your Oversight Role: Legal Precedent (Snyder VS SCE) & Contractual
. Coercive	

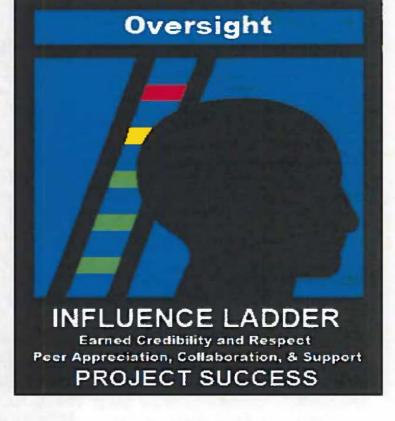
#### **Coaching Tips:**

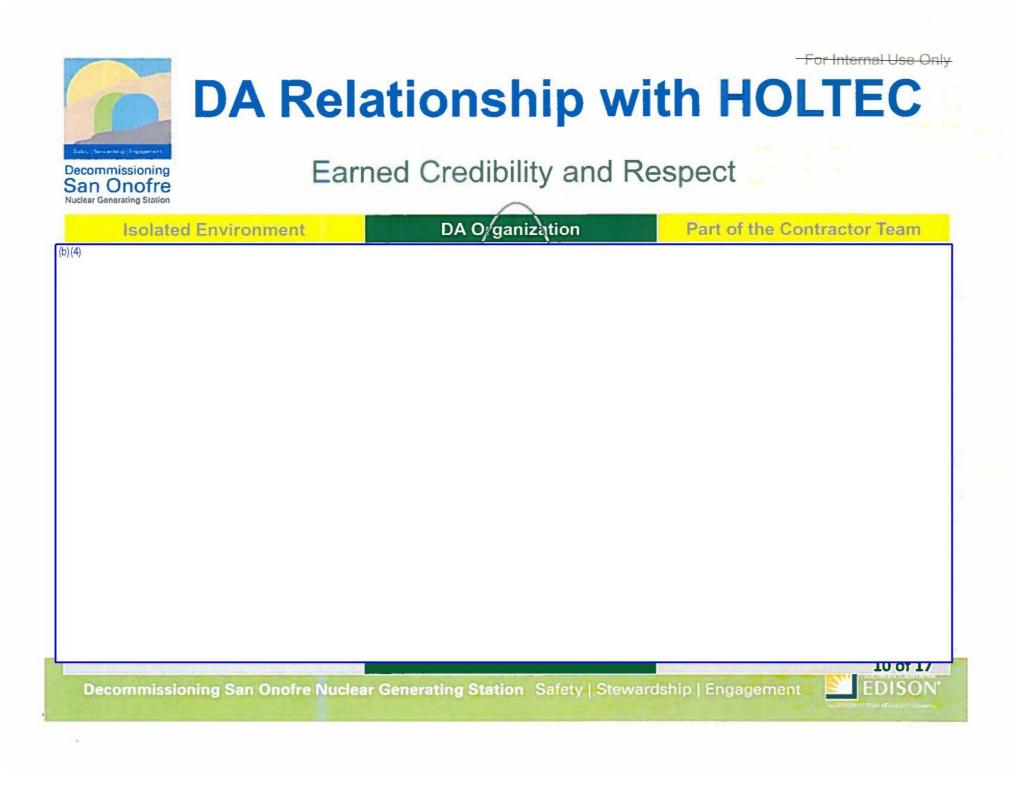
- Referent power is built up over time by your perceived sincerity when applying the 5 E 's.
- Never stop mastering your area of responsibly or the oversight craft. KNOWLEDGE IS POWER and CREDIBILITY
- Simple Rewards: Attentive listening, acknowledge a person's concerns, letting a person save "face", or a Smile...
- Avoid the trap of "impatience" causing over reliance on your legitimate authority.
- Practice STAR before using coercive influence to achieve compliance or to change behavior.

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### **Influence Ladder**





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**Oversight Behaviors In the Field** 

Decommissioning San Onofre Nuclear Generating Station

#### Poor examples

**Good examples** 

(b)(4)





Decommissioning San Onofre Nuclear Generating Station

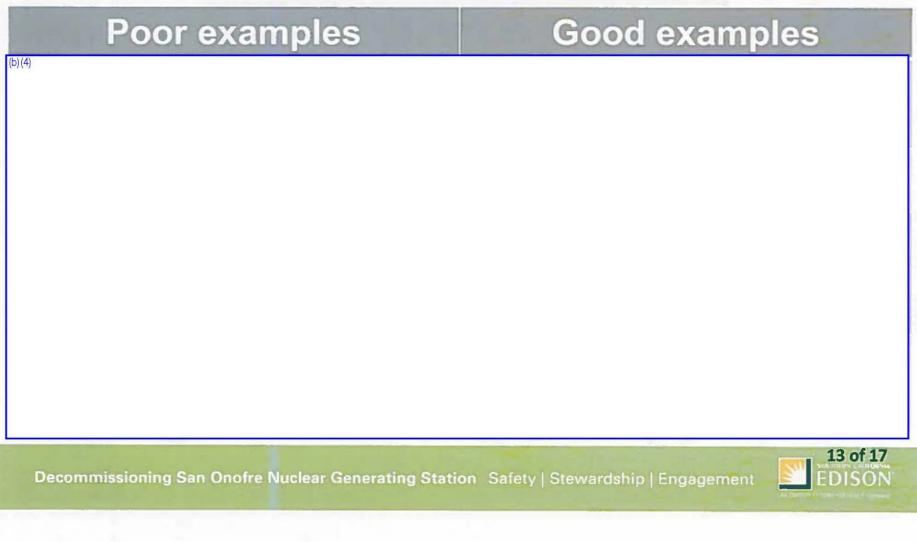
## **Oversight Behaviors Internal to DA**

**Good examples Poor examples** (b)(4) 12 of 17 EDISON Decommissioning San Onofre Nuclear Generating Station Safety | Stewardship | Engagement



**Delivering Comments to HOLTEC** 

Decommissioning San Onofre Nuclear Generating Station

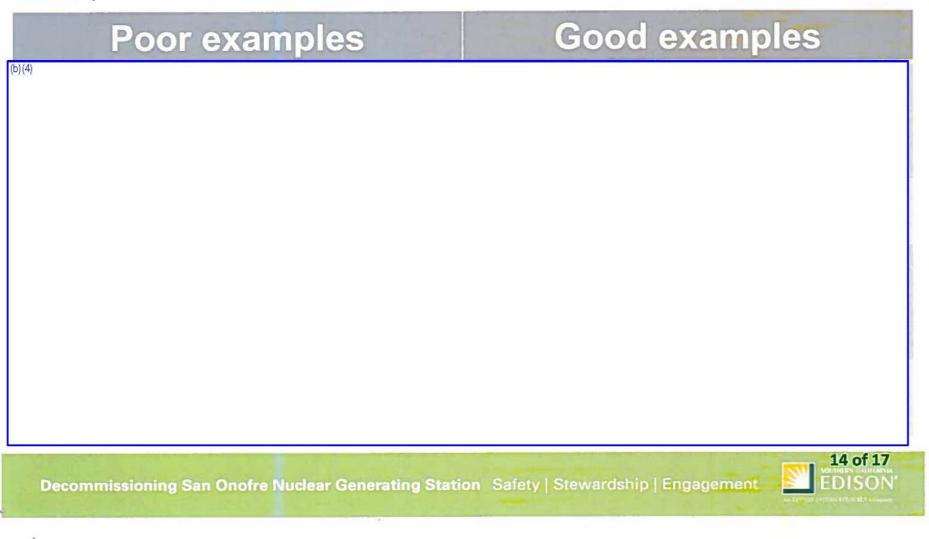


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**Responses to External Agencies** 

Decommissioning San Onofre Nuclear Generating Station



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Decommissioning San Onofre Nuclear Generating Station

### **Document Review Standard**

**Over-bearing** Standard Leniency (b)(4) 15 of 17 Decommissioning San Onofre Nuclear Generating Station Safety | Stewardship | Engagement **FDISON** 

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### Written Comments - "Our Product"

Decommissioning San Onofre Nuclear Generating Station

(b)(4)





# **Oversight Behaviors Summary**

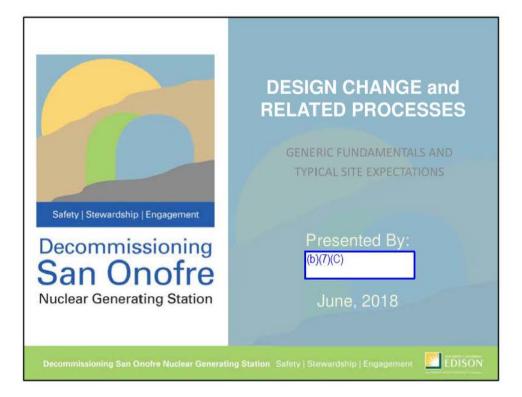
#### To be successful:

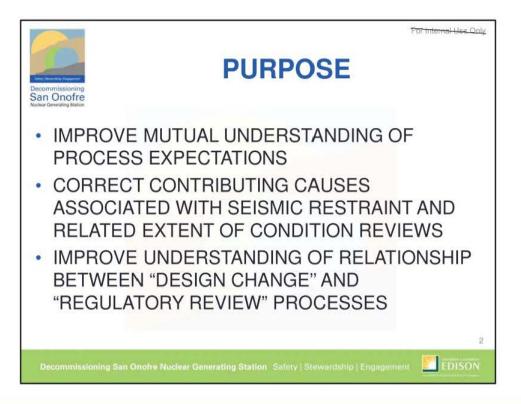
- Know Your Oversight Role and Authority
- Understand Defense in Depth
- Apply Oversight Priorities
- Proactively Identify Trends
- Know "What wrong looks like"
- Know "What good looks like"
- Exemplify Proper Oversight Behaviors
- Earn Credibility and Respect
- Follow the "Influence Ladder" Guidance



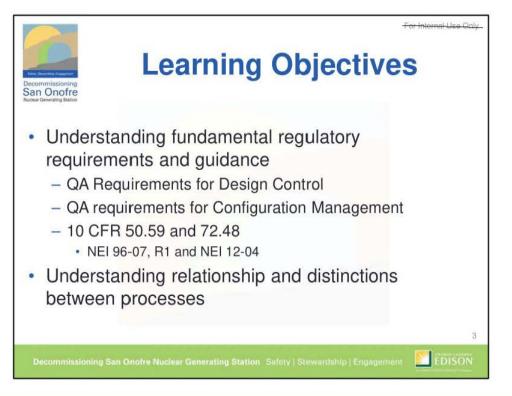
## This is not going to be easy!!!

17 of 17

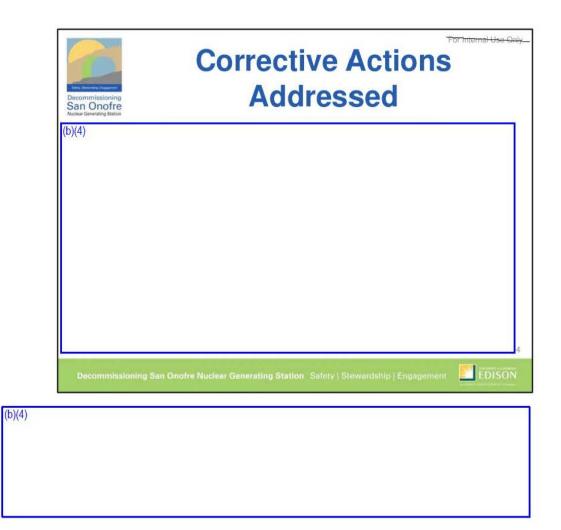


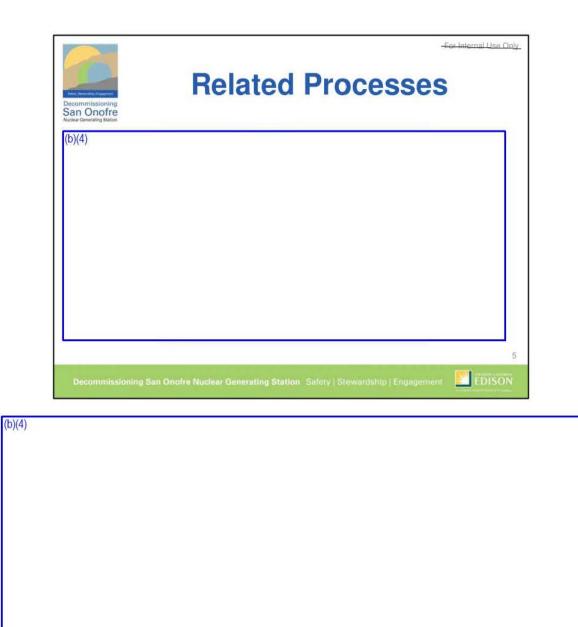


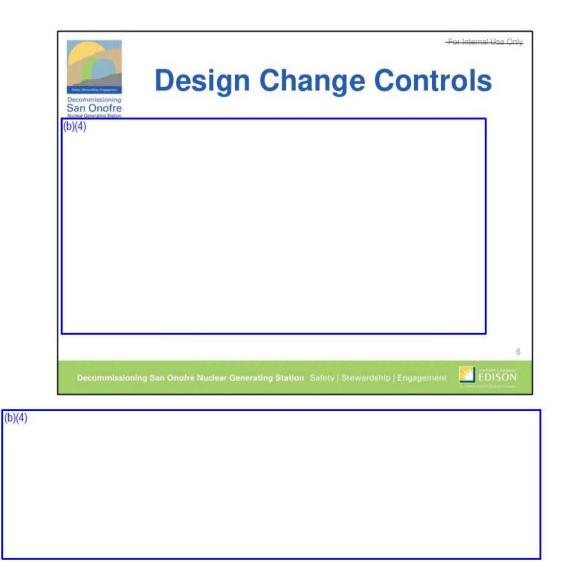


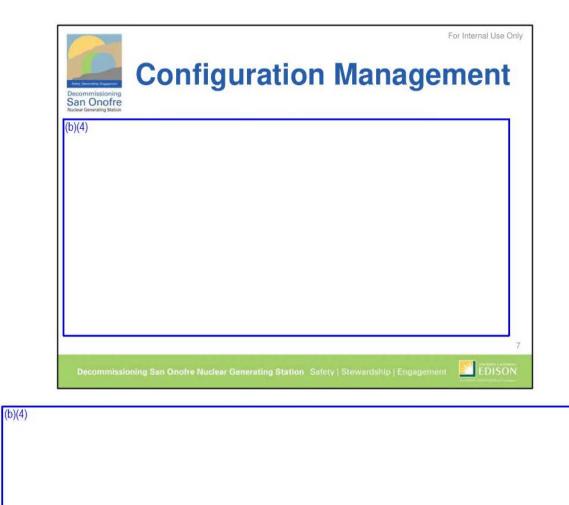


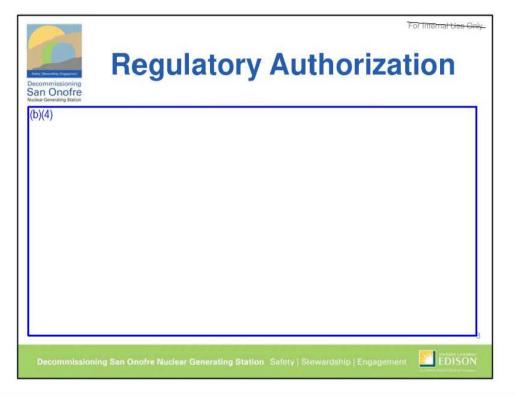




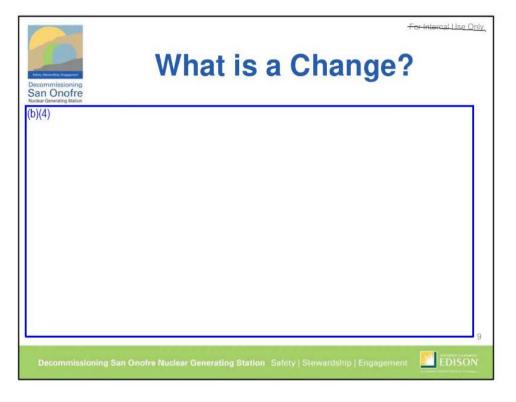




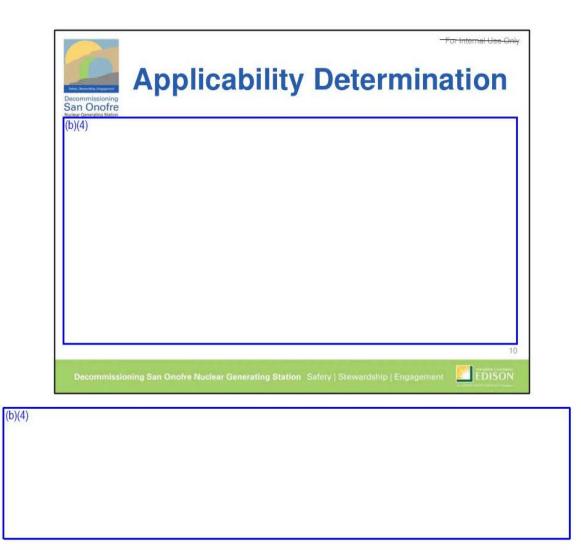


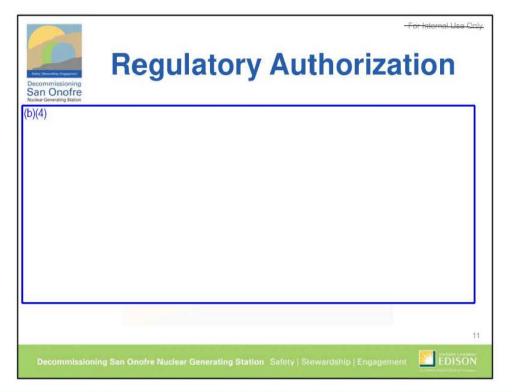








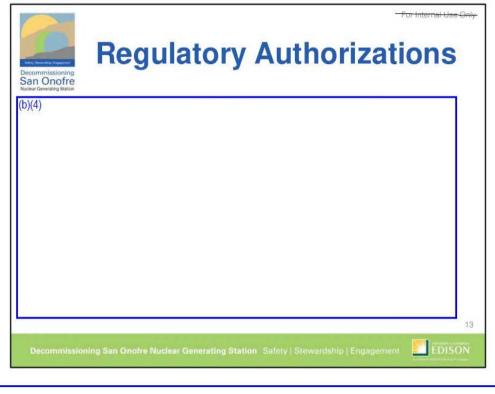




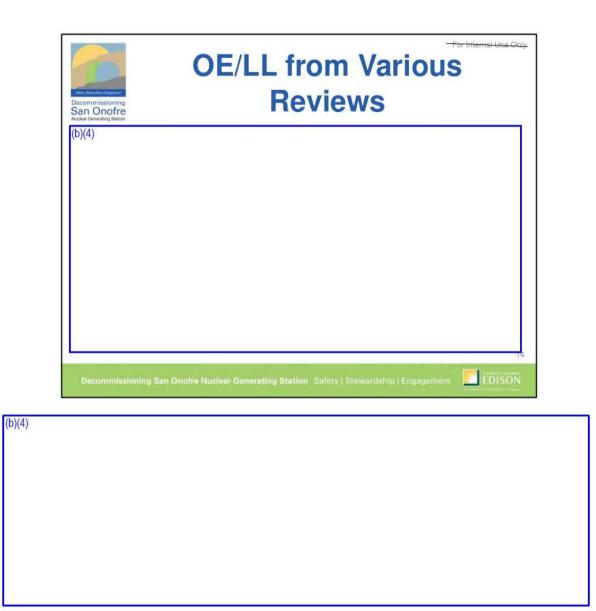


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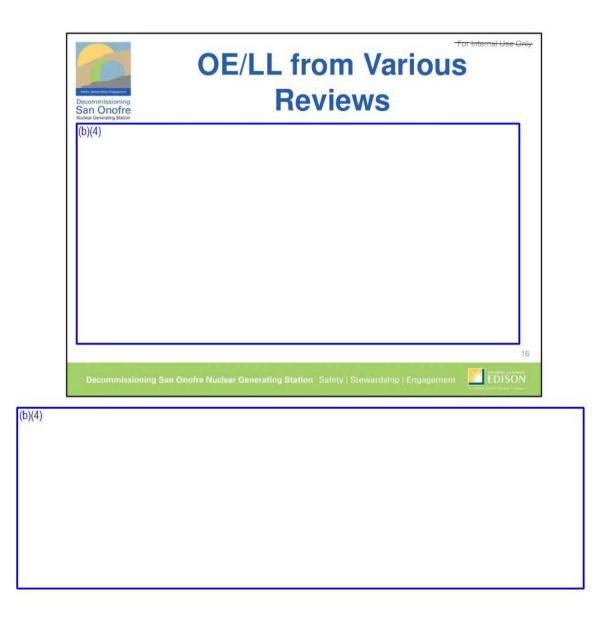


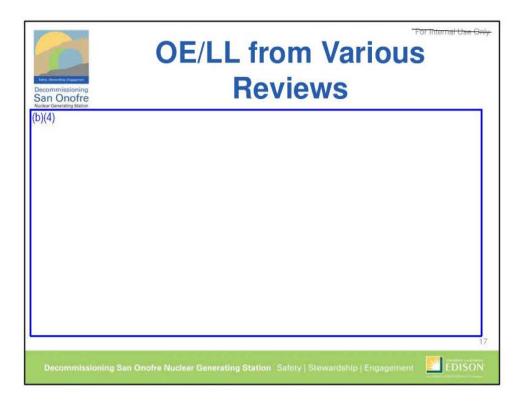


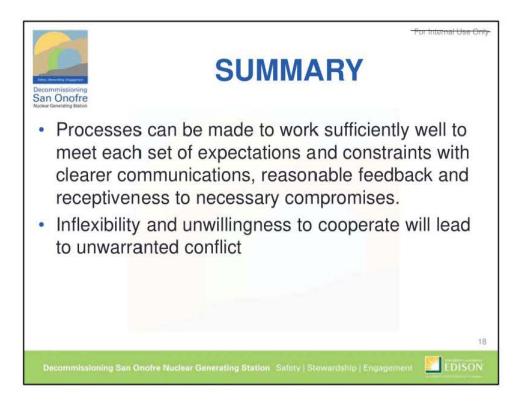














Safety | Stewardship | Engagement

# Decommissioning San Onofre

**Nuclear Generating Station** 

## Rigorous Process and Engineering Involvement Training

**Oversight Behaviors** 



(b)(7)(C)



# **Ground Rules**

Pagers and phones on silent mode

Practice good housekeeping

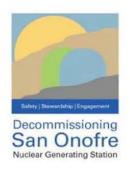
Phone calls, texting, and messages only on breaks, unless it is an emergency

Know your fire escape plan

**Sign Attendance Sheet** 









- Who is CPR qualified/basic first aid qualified?
- Emergency Response Number is x86911
- Who will meet emergency response personnel?





### **Decommissioning Principles**

"Safety is and always will be our top priority and now is a core value. Performing our jobs safely correctly and efficiently is fundamental to our success in decommissioning San Onofre."

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(b) (4)		





- Understand, as members of the DA organization, the regulations governing responsibility for • implementation of the Quality Assurance Program
- Understand 10CFR50 Appendix B Criterion V (and 10CFR72 equivalent) for procedures • establishes requirement for rigorous process.
- Describe Station/SCE organizational interfaces and how to get the right people involved •
- Understand the Seismic Baseplate Event and what procedures should have prevented it. .
- Oversight Role Behaviors "what good looks like" •
  - In the field •
  - Internal to DA Oversight •
  - •
  - Writing and delivering of comments to HOLTEC Responding to representatives from external Agencies .
- Describe what behaviors need to be exhibited moving forward to prevent the same or similar . events



### **Quality Assurance Regulations**

10CFR50 Appendix B

- As used in this appendix, "quality assurance" comprises all those planned and systematic actions necessary to provide adequate confidence that a structure, system, or component will perform satisfactorily in service.
- The applicant may delegate to others, such as contractors, agents, or consultants, the work of establishing and executing the quality assurance program, or any part thereof, but shall retain responsibility for the quality assurance program.



# **Quality Assurance Regulations**

10CFR72 Subpart G

- This subpart describes quality assurance requirements that apply to <u>design</u>, <u>purchase</u>, <u>fabrication</u>, <u>handling</u>, <u>shipping</u>, <u>storing</u>, <u>cleaning</u>, <u>assembly</u>, <u>inspection</u>, <u>testing</u>, <u>operation</u>, <u>maintenance</u>, <u>repair</u>, <u>modification</u> of structures, systems, and components, and decommissioning that are important to safety.
- The licensee and the certificate holder are also simultaneously responsible for these quality assurance requirements through the oversight of contractors and subcontractors.
- Each licensee, applicant for a license, certificate holder, applicant for a CoC shall establish, maintain, and execute a quality assurance program satisfying each of the applicable criteria of this subpart, and <u>satisfying any specific</u> provisions which are applicable to the licensee's, applicant's for a license, certificate holder's, and applicant's for a CoC activities.



### **10CFR50 Appen B Criterion V**

Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.



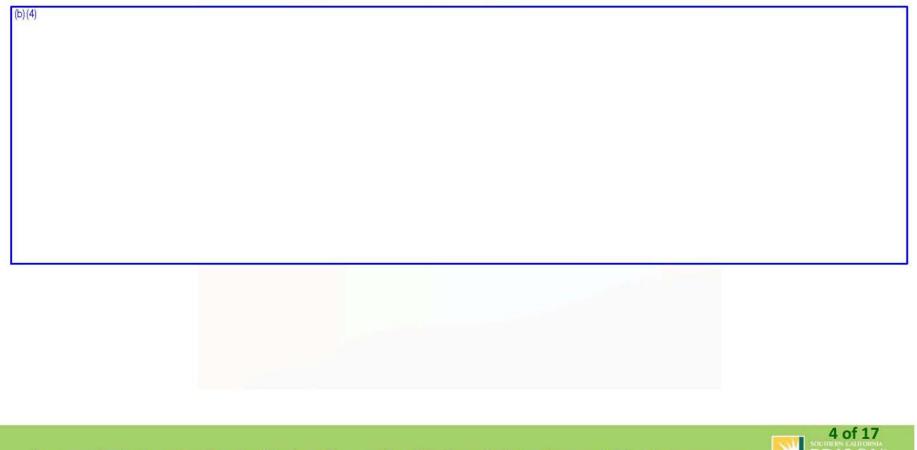


# **10CFR50.59** (similar to 10CFR72.48)

- A licensee <u>may make changes in the facility</u> as described in the final safety analysis report (as updated), make changes in the procedures as described in the final safety analysis report (as updated), and conduct tests or experiments not described in the final safety analysis report (as updated) without obtaining a license amendment pursuant to Sec. 50.90 only if:
- The licensee shall maintain records of changes in the facility, of changes in procedures, and of tests and experiments made pursuant to paragraph (c) of this section. <u>These records must</u> <u>include a written evaluation which provides the bases</u> for the determination that the change, test, or experiment does not require a license amendment pursuant to paragraph (c)(2) of this section.



### How does Organizational Structure influence the way we think about work?



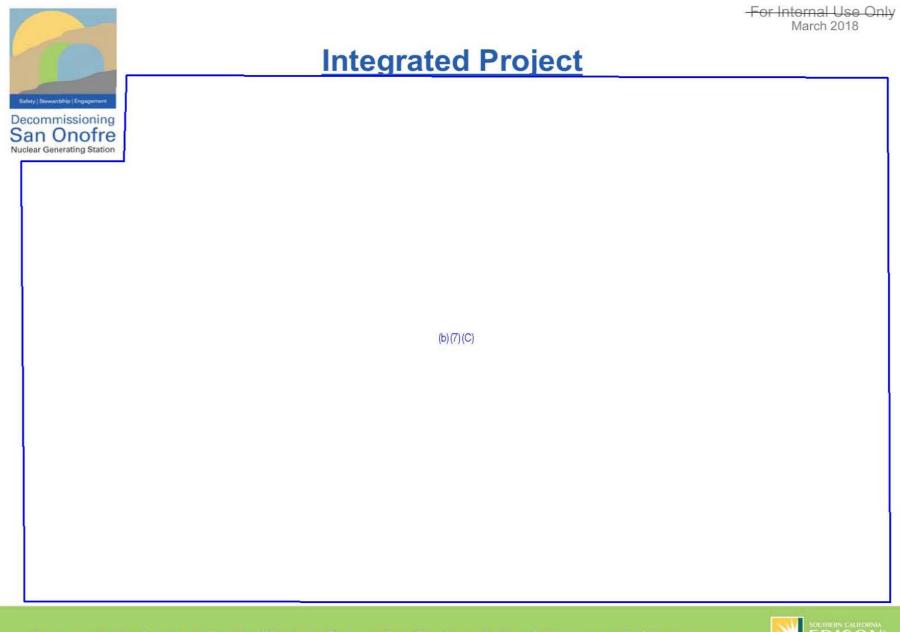
















Decommissioning San Onofre Nuclear Generating Station

#### **Integrated Project**

(b)(4)

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### **The Seismic Baseplate Event**

(b)(4)



### **The Seismic Baseplate Event**

(b)(4)



### **The Seismic Baseplate Event**

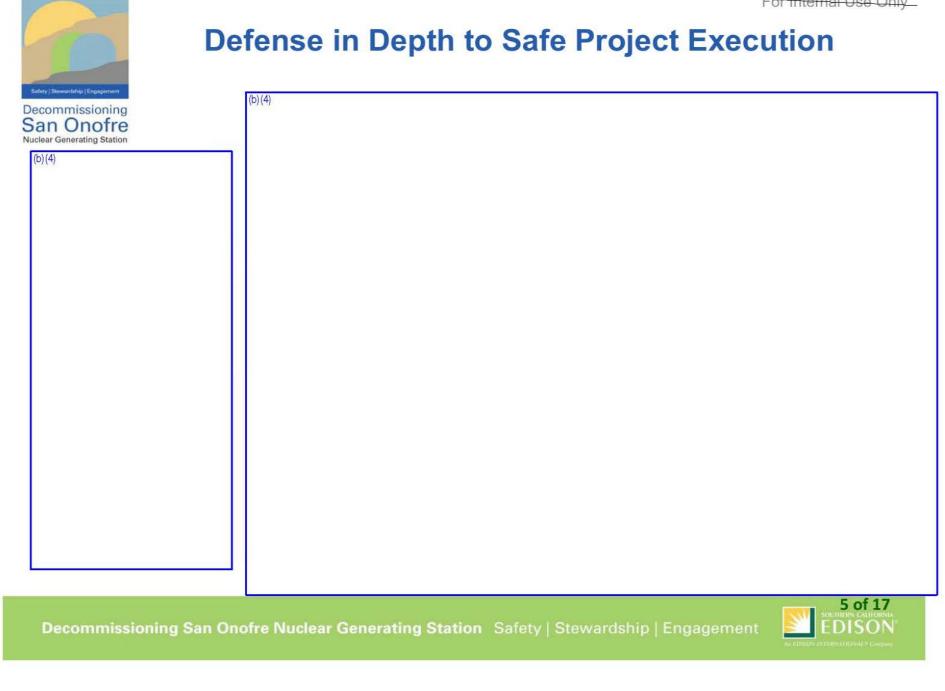
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### **Exercise Report Out**

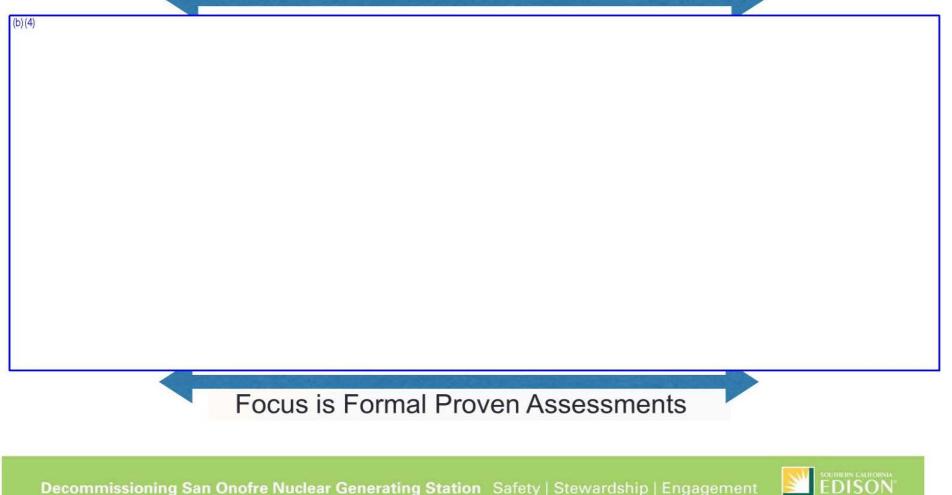
- How many opportunities did Holtec have to identify and correct the issue?
- Was there sufficient direction in procedures to lead them to the correct resolution?
- How many opportunities did SCE have to identify and correct the issue?
- Was there sufficient direction in procedures to lead us to the correct spot?
- Where were the opportunities to get Engineering involvement?





### **Oversight Framework**

Focus is In-Field Situational Awareness





Nuclear Generating Station

### **Situational Awareness**

Drive home behaviors that elevate execution excellence						
Observations	<b>Records Review</b>	<b>Document Review</b>	Area Inspections			
b)(4)						
Decommissioning San One	ofre Nuclear Generating Stati	on Safety   Stewardshin   En				

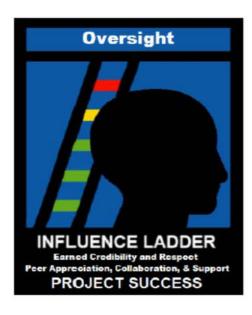


San Onofre Nuclear Generating Station **Performing A Good Observation** 

(b)(4)



#### **Influence Ladder**



#### **Stay in the Green**

#### WHY IMPORTANT:

To focus attention on how to effectively interact with the Contractor and peers to ensure the following:

Safety Adherence 
 Compliance with Requirements 
 Financial Stewardship

#### When:

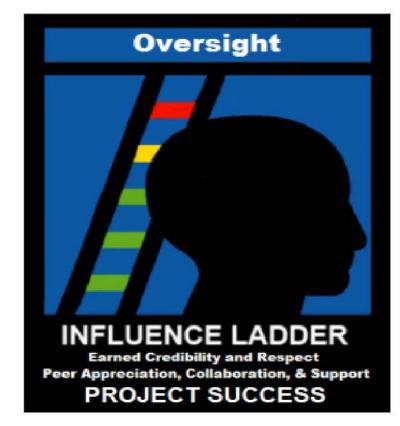
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#### How:

Apply hierarchal order and general rules of influence during interactions:

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2	Expert	Subject matter expertise thorough understanding
		of OE, best practice, rules, procedures, and processes
3. 1	Reward	Convey your gratitude for support, and keep energy positive,
		value the opinion of others, SMILE.
4	Legitimate	Authority derived by your Oversight Role: Legal Precedent
-		(Snyder VS SCE) & Contractual
	Coercive	Last resort, influence by threating or evoking negative
		consequences. Example: Threating to Stop Work.

#### **Influence Ladder**

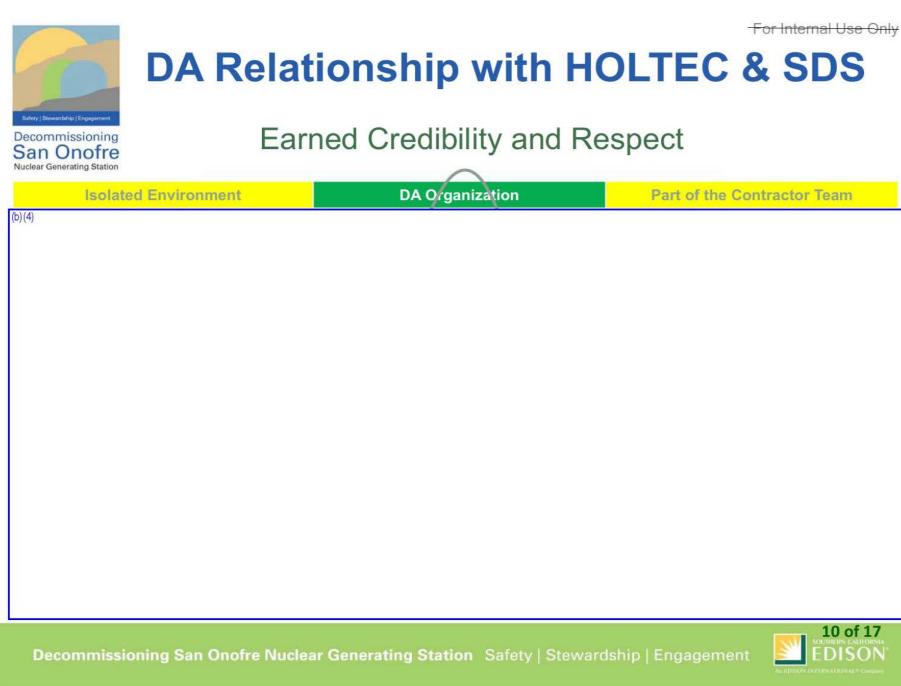


#### **Coaching Tips:**

- Referent power is built up over time by your perceived sincerity when applying the 5 E 's.
- Never stop mastering your area of responsibly or the oversight craft. KNOWLEDGE IS POWER and CREDIBILITY
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- Avoid the trap of "impatience" causing over reliance on your legitimate authority.
- Practice STAR before using coercive influence to achieve compliance or to change behavior.









**Oversight Behaviors In the Field** 

Decommissioning San Onofre Nuclear Generating Station



#### Good examples

(b)(4)





Decommissioning San Onofre Nuclear Generating Station

(b)(4)

**Oversight Behaviors Internal to DA** 

Poor examples

#### **Good examples**





### **Delivering Comments to HOLTEC/SDS**

Decommissioning San Onofre Nuclear Generating Station

(b)(4)



#### Good examples





Decommissioning San Onofre Nuclear Generating Station

#### **Document Review Standard**

**Over-bearing** Standard Leniency (b)(4) 15 of 17 5 EDISON Decommissioning San Onofre Nuclear Generating Station Safety | Stewardship | Engagement



San Onofre Nuclear Generating Station

#### Written Comments - "Our Product"

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### **Oversight Behaviors Summary**

#### To be successful:

- Know Your Oversight Role and Authority
- Understand Defense in Depth
- Apply Oversight Priorities
- Proactively Identify Trends
- Know "What wrong looks like"
- Know "What good looks like"
- Exemplify Proper Oversight Behaviors
- Earn Credibility and Respect
- Follow the "Influence Ladder" Guidance



### This is not going to be easy!!!

17 of 17



### **Oversight Behaviors**

Based on what we now know, what are we going to do different?



### This is not going to be easy!!!

17 of 17





#### We Are In This Together Your Feedback Is Welcome

### **OVERSIGHT**

We are in the business to hold the contractor accountable to the terms of the contract, procedure use and adherence, deliverables, performance and expectations, and any other commitments made during submittals or

meetings. (b)(4)





Safety | Stewardship | Engagement

## Decommissioning San Onofre

**Nuclear Generating Station** 

### Decommissioning Agent (DA) Training

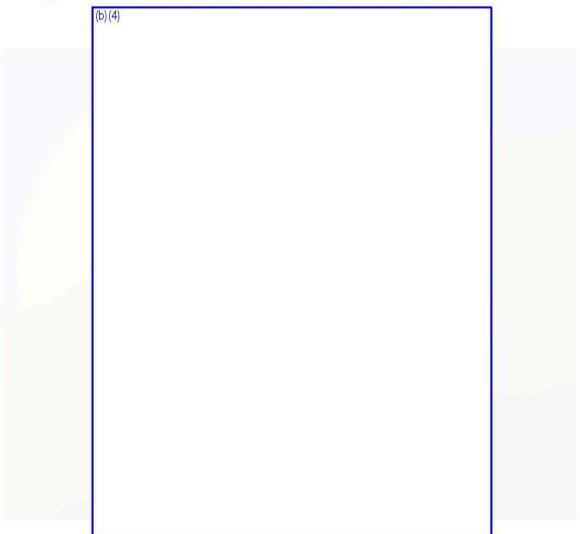
Oversight Readiness for Two Unit Operations

Presented By:

(b)(7)(C)



### **Oversight Organization Structure**





### Oversight Readiness Resources

(b)(4)



# **Oversight Readiness** Risk Based Oversight Approach





# Trending Data and Addressing Challenges

(b)(4)





Nuclear Generating Station

## FTO Challenges / Lessons Learned Log

Line #	Unique ID #	Chronological Canister #	Repeat	Category:	Description:	Date:
(b) (4)						





#### Decommissioning

## **FTO Incident Tracking Matrix**

<u> </u>	¢																						
			Key:	Work	Execution	Instal Accep	lation tability	FN	ME	Elect	trical		nent Fail Ieliability			ering / Wor ge Planning		9/ALARA		ning / ty Regs	Mater Compo Spa		
Major Offload Phase:	Evolution ID #:	Scope / Work Step:																	Can	ister #	(Chro	nologi	ical):
			Dry Runs	1	2	3	4	5	6	7	8	9	10	11	12	13 1	14 15	16	17	18	19	20	21
(b)(4)																							

(b)(4)





Nuclear Generating Station

## FTO Lessons Learned Work-Association Matrix

ldentifier≢	Description:	Plant:	Note	Canister Start	MPC Preps Out of FHB	Drain Tube Install	Lifts to FHB FHB	Annulus Seal	RVOA	Lift Into Pool	Fuel Loading	Lift Out of Pool	Lid Installation	Decontamination and Cask Washdown Setup	Blowdown	FHD Weldin	g Port Cap Install	Lifts Out of FHB	
(b) (4)																			

Decommissioning San Onofre Nuclear Generating Station Safety | Stewardship | Engagement





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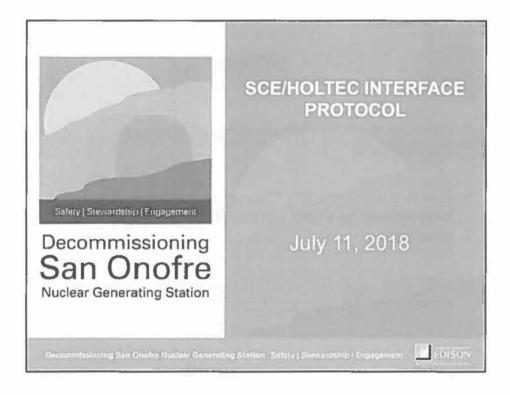
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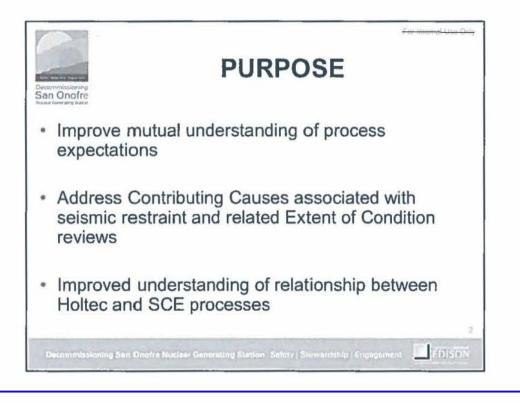
# FTO Work-Step Mapping Matrix

INTERNAL WORKING DRAFT - SUBJECT TO SONGS DECOMMISSIONING AGREEMENT SECTION 19.2

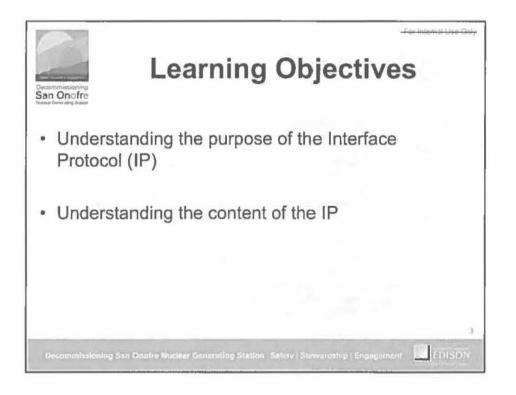
Decommissioning San Onofre Nuclear Generating Station Safety | Stewardship | Engagement



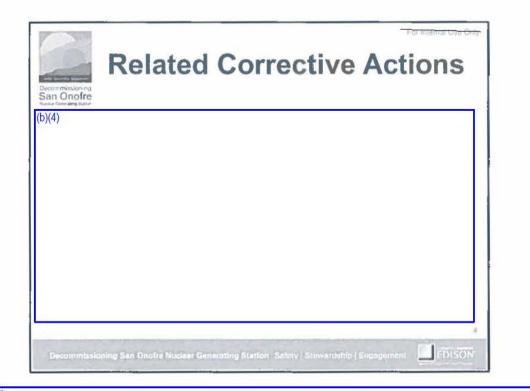




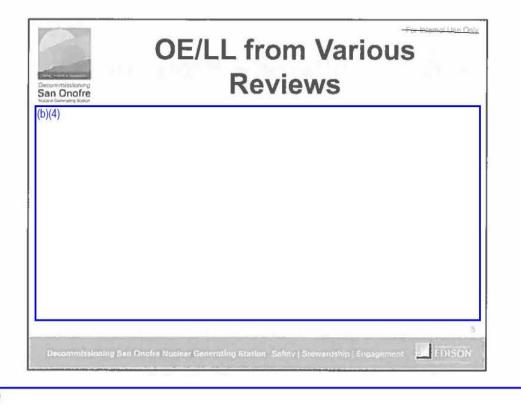




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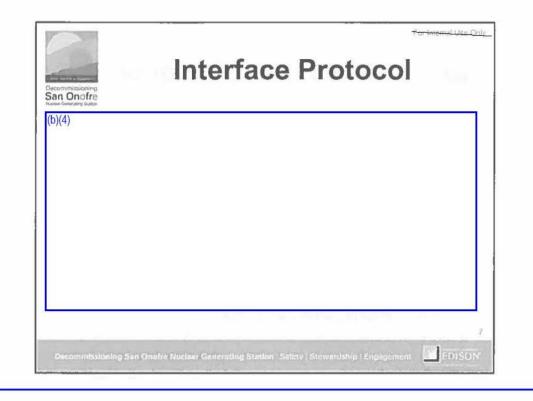


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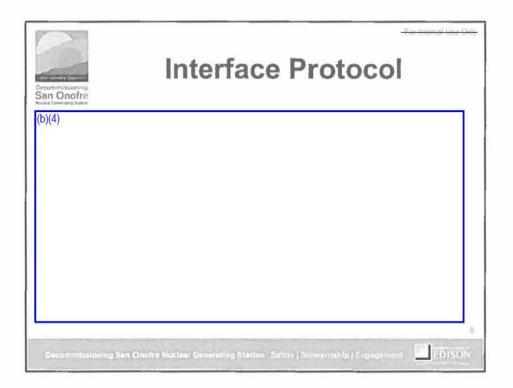
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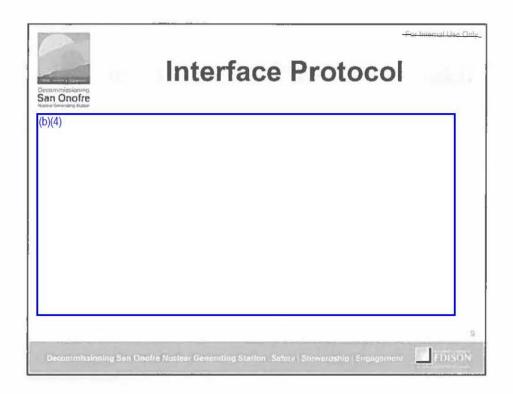




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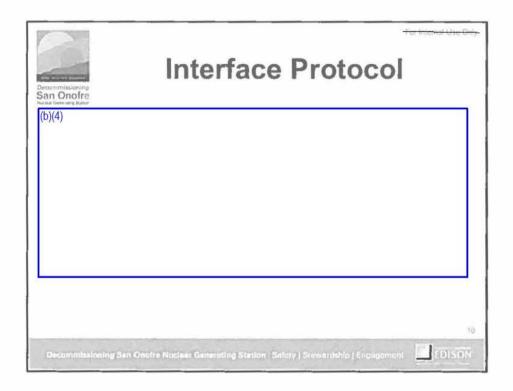


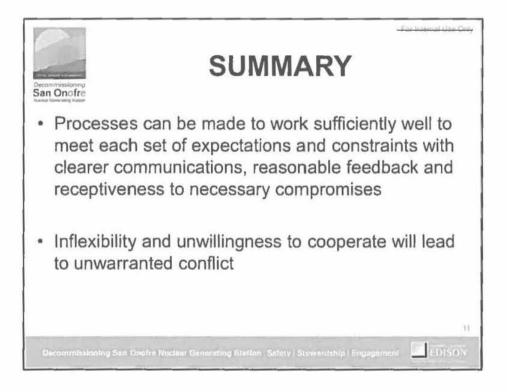


**Key Procedure** 

SO23-I-3.53, Nuclear Fuel Movement - Spent Fuel Pool (Maintenance)

HPP-2464-100, MPC Pre-Operation Inspection HPP-2464-200, MPC Loading at SONGS HPP-2464-300, MPC Sealing at SONGS HPP-2464-400, MPC Transfer at SONGS; HPP-2464-500, MPC Unloading at SONGS HPP-2464-600, Responding to Abnormal Conditions.

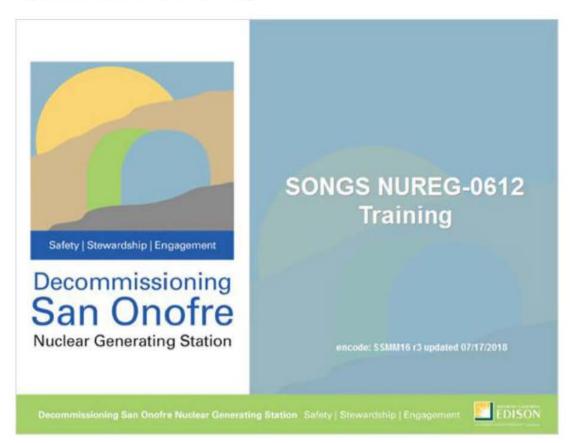




## NUREG 0612 rev 3 final ShareKnowledge

## **1. Untitled Scene**

#### 1.1 SONGS NUREG-0612 Training



#### 1.2 Home

#### SONGS NUREG - 0612 Training

Safety is, and always will be, our top priority. Performing our jobs safely, correctly, and efficiently is fundamental to our success in decommissioning San Onofre.

We have a commitment to our community, our co-workers, our company, and the nuclear industry to always work safely and error free. As we proceed with decommissioning, we must take the appropriate time to safely do our work right the first time and comply with all commitments and requirements.

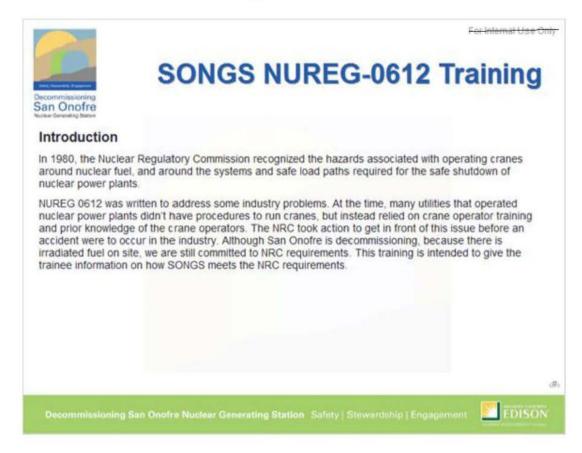


Decommissioning San Onofre Nuclear Generating Station

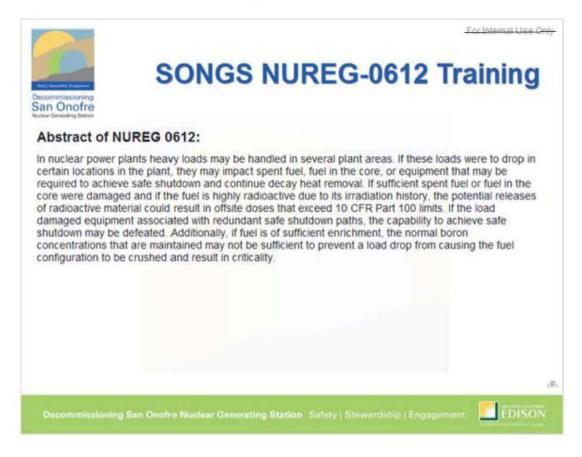
## 1.3 SONGS NUREG-0612 Training

¢		For internal Use Only
Sar	SONGS N	UREG-0612 Training
0	bjectives	
	on completion of this training, students will be le to:	
1.	Describe the NUREG 0612 Program and its applicability to SONGS.	
2	Describe recent industry Operating Experience (OE) related to NUREG 0612.	
3.	Describe the SONGS site-specific requirements regarding NUREG 0612 as outlined in the SONGS crane procedures.	
D	ecommissioning San Onofre Nuclear Generating St	tation Safety   Stewardship   Engagement EDISON

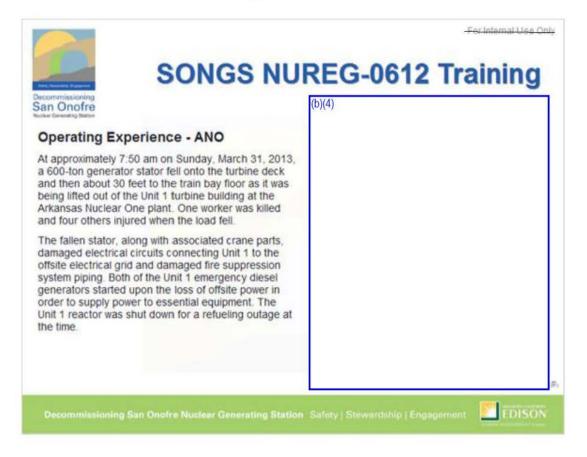
#### 1.4 SONGS NUREG-0612 Training



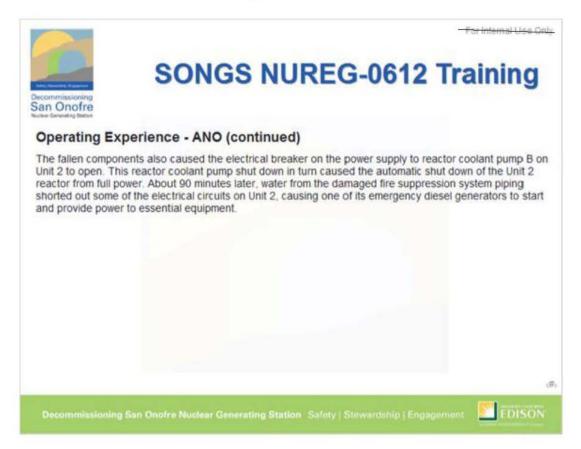
#### 1.5 SONGS NUREG-0612 Training



#### 1.6 SONGS NUREG-0612 Training



#### 1.7 SONGS NUREG-0612 Training



## 1.8 SONGS NUREG-0612 Training

Songs N	UREG-0612 Training
Operating Experience - SONGS (b)(4)	(b)(4)
Decommissioning San Onofre Nuclear Generating S	tation Safety   Stewardship   Engagement

#### 1.9 SONGS NUREG-0612 Training



## 1.10 SONGS NUREG-0612 Training

	7	or Internat Use Only
Decommissioning San Onofre	SONGS NUREG-0612 Tra	ining
Number Generating Station	perience - SONGS	
(b)(4)		
		(#)
Decommissioning (	San Onofre Nuclear Generating Station   Safety   Stewardship   Engagement	EDISON

## 1.11 SONGS NUREG-0612 Training

	7	or internal Use Only
Deconvinisationing San Onofre	SONGS NUREG-0612 Tra	ining
Operating Experie	ence – SONGS (Continued)	
(b)(4)		
		(#)
Decommissioning Sar	Onofre Nuclear Generating Station Safety   Stewardship   Engagement	EDISON

## 1.12 SONGS NUREG-0612 Training

	For Internal Use Only
SON	GS NUREG-0612 Training
San Onofre Number Generating Station	(b)(4)
Operating Experience – SONGS (b)(4)	(Continued)
Decommissioning San Onofre Nuclear (	Generating Station Safety   Stewardship   Engagement EDISON

## 1.13 SONGS NUREG-0612 Training

Cheropetratises/orange	JREG-0612 Training
San Onofre Verter Generating Experience – SONGS (Continued)	(b)(4)
(b)(4)	
Decommissioning San Onofre Nuclear Genera	ting Station Safety   Stewardship   Engagement EDISON

## 1.14 SONGS NUREG-0612 Training

Decommissioning San Onofre	SONGS NUREG-0612 Tra	nining
Number Generating Station	dure Requirements	_
Decommissioning (	San Onofre Nuclear Generating Station Safety   Stewardship   Engagement	#

## 1.15 SONGS NUREG-0612 Training

	+	or Internal Use Only
Decommissioning San Onofre	SONGS NUREG-0612 Tra	ining
SONGS Implen	nentation of NUREG 0612 Guidelines	
(b)(4)		
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Decommissioning S	an Onofre Nuclear Generating Station Safety   Stewardship   Engagement	EDISON

## 1.16 SONGS NUREG-0612 Training

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Decommissioning San Onofre	SONGS NUREG-0612 Tra	ining
SONGS Imple	ementation of NUREG 0612 Guidelines	
(b)(4)		
		. (#.)
Decommissioning	San Onofre Nuclear Generating Station Safety   Stewardship   Engagement	EDISON

## 1.17 SONGS NUREG-0612 Training

	For	Internal Use Only-
And Interest Concerns	SONGS NUREG-0612 Tra	ining
SONGS Imple	mentation of NUREG 0612 Guidelines	
(b)(4)		
		(8)
Decommissioning (	San Onofre Nuclear Generating Station Safety   Stewardship   Engagement	EDISON

## 1.18 SONGS NUREG-0612 Training

Lette Martin Towers Decommissioning San Onofree Nature Gowarding Datase	SONGS NU	REG-0612 Trai	ning
(b)(4)			
	here to return to the ning of the course.	Click here to start the exam.	,#s
Decommissioning S	San Onofre Nuclear Generating Statio	n Salety   Stewardship   Engagement	EDISON

#### **MPC Production Traveler**

	Activity Description	Start (Date/Time)	Duration (Hrs/Min)	Goal (Hrs)
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#### Variance Explanations and Comments – Reference Activity #

(b)(4)

#### **MPC Production Traveler**

	Activity Description	Start (Date/Time)	Duration (Hrs/Min)	Goal (Hrs)
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Variance Explanations and Comments – Reference Activity # (b)(4)

(b)(4)

#### **MPC Production Traveler**

	Activity Description	Start (Date/Time)	Duration (Hrs./Min)	Goal (Hrs.)
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Variance Explanations and Comments – Reference Activity # (b)(4)

(b)(4)			

### Unit 2 Cask #11

	Activity Description	Start	Duration	Goal
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(b)(4)			

### Unit 2 Cask #12

	Activity Description	Start	Duration	Goal
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### Unit 2 Cask #13

	Activity Description	Start (Date/Time)	Duration (Hrs./Min)	Goal (Hrs.)
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### Unit 2 Cask #14

	Activity Description	Start (Date/Time)	Duration (Hrs./Min)	Goal (Hrs.)
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### Unit 2 Cask #15

	Activity Description	Start (Date/Time)	Duration (Hrs./Min)	Goal (Hrs.)
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### Unit 2 Cask #16

	Activity Description	Start	Duration	Goal
		(Date/Time)	(Hrs./Min)	(Hrs.)
1	(b)(4)			
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Variance Explanations and Comments – Reference Activity #

	Activity Description	Start (Date/Time)	Duration (Hrs./Min)	Goal (Hrs.)
1	(b)(4)			
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Unit 3 Cask #5

	Activity Description	Start	Duration	Goal
1	(b)(4)	(Date/Time)	(Hrs./Min)	(Hrs.)
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(b)(4)	

	Activity Description	Start	Duration	Goal
		(Date/Time)	(Hrs./Min)	(Hrs.)
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# Variance Explanations and Comments – Reference Activity #

(b)(4)			

	Activity Description	Start	Duration	Goal
1	(b)(4)	(Date/Time)	(Hrs./Min)	(Hrs.)
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Variance Explanations and Comments – Reference Activity #

### 6/23 Unit 3 Cask #8

# **MPC Production Traveler**

	Activity Description	Start (Date/Time)	Duration (Hrs./Min)	Goal (Hrs.)
1	(b)(4)			
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Variance Explanations and Comments – Reference Activity #

#### Unit 3 Cask #9

	Activity Description	Start	Duration	Goal
		(Date/Time)	(Hrs./Min)	(Hrs.)
1	(b)(4)			
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Variance Explanations and Comments – Reference Activity #

	Activity Description	Start	Duration	Goal
		(Date/Time)	(Hrs./Min)	(Hrs.)
1	(b)(4)			
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Variance Explanations and Comments – Reference Activity #

### Unit 3 Cask #11

	Activity Description	Start (Date/Time)	Duration (Hrs./Min)	Goal (Hrs.)
1	(b)(4)			
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Variance Explanations and Comments – Reference Activity #

### Unit 3 Cask #12

	Activity Description	Start (Date/Time)	Duration (Hrs./Min)	Goal (Hrs.)
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Variance Explanations and Comments – Reference Activity #

### Unit 3 Cask #13

	Activity Description	Start	Duration	Goal
1	(b)(4)	(Date/Time)	(Hrs./Min)	(Hrs.)
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Variance Explanations and Comments – Reference Activity #