UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

July 20, 2020

Mr. Doug Bauder
Vice President and Chief Nuclear Officer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION – NRC INSPECTION REPORT 05000206/2020-002, 05000361/2020-002, AND 05000362/2020-002

Dear Mr. Bauder:

This letter refers to the U.S. Nuclear Regulatory Commission's (NRC's) inspection conducted on May 21-25, 2020, and June 15-18, 2020, at the San Onofre Nuclear Generating Station (SONGS), Units 1, 2, and 3. The NRC inspectors discussed the results of this inspection with members of your staff during a final teleconference exit meeting conducted on June 23, 2020. The inspection results are documented in the enclosure to this letter.

This inspection examined activities conducted under your license as they relate to public health and safety, the common defense and security, and to confirm compliance with the Commission's rules and regulations, and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of site meetings, performance of independent radiation measurements, and interviews with personnel. Specifically, the inspectors reviewed decommissioning planning activities for SONGS Units 2 and 3, effectiveness of the corrective action program, controls of spent fuel pool safety, and implementation of the solid radioactive waste management and transportation of radioactive materials program. Within the scope of the inspection, no violations were identified and a response to this letter is not required.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC's Website at http://www.nrc.gov/reading-rm/adams.html. To the extent possible, your response should not include any personal privacy or proprietary, information so that it can be made available to the Public without redaction.

If you have any questions regarding this inspection report, please contact Stephanie Anderson at 817-200-1213, or the undersigned at 817-200-1249.

Sincerely,

Gregory G. Warnick

Digitally signed by Gregory G. Warnick
Date: 2020.07.20 14:10:21 -05'00'

Gregory G. Warnick, Chief
Reactor Inspection Branch
Division of Nuclear Materials Safety

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

Enclosure:
Inspection Report 05000206/2020-002;
05000361/2020-002; 05000362/2020-002
w/Attachment: Supplemental Information

SAN ONOFRE NUCLEAR GENERATING STATION – NRC INSPECTION REPORT
05000206/2020-002; 05000361/2020-002; 05000362/2020-002 - DATED JULY 20, 2020

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U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket Nos.:	05000206; 05000361; 05000362
License Nos.:	DPR-13; NPF-10; NPF-15
Report Nos.:	05000206/2020-002; 05000361/2020-002; 05000362/2020-002
Licensee:	Southern California Edison Company
Facility:	San Onofre Nuclear Generating Station, Units 1, 2, and 3
Location:	5000 South Pacific Coast Highway, San Clemente, California
Inspection Dates:	May 21-25, 2020 and June 15-18, 2020
Inspectors:	Stephanie G. Anderson, Health Physicist Reactor Inspection Branch Division of Nuclear Materials Safety
	Robert J. Evans, PhD, CHP, PE, Senior Health Physicist Material Licensing and Decommissioning Branch Division of Nuclear Materials Safety
Approved By:	Gregory G. Warnick, Chief Reactor Inspection Branch Division of Nuclear Materials Safety

Enclosure

EXECUTIVE SUMMARY

San Onofre Nuclear Generating Station, Units 1, 2, and 3
NRC Inspection Report 05000206/2020-002; 05000361/2020-002; 05000362/2020-002

This U.S. Nuclear Regulatory Commission (NRC) inspection was a routine, announced inspection of decommissioning activities being conducted at the San Onofre Nuclear Generating Station, Units 1, 2, and 3. In summary, the licensee was conducting these activities in accordance with site procedures, license requirements, and applicable NRC regulations. Within the scope of the inspection, no violations were identified.

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

- The licensee and its decommissioning general contractor established and implemented self-assessment programs to independently identify, resolve, and prevent problems that may impact nuclear safety and the quality of decommissioning. The licensee and its contractor also implemented quality assurance audit programs that were effective in identifying, resolving, and preventing possible program weaknesses. In addition, the licensee and its contractor established comprehensive corrective action programs to identify, resolve, and prevent problems that may impact nuclear safety and decommissioning. Finally, the licensee and its contractor staffed the quality assurance programs in accordance with the requirements specified in the quality assurance plans. (Section 1.2)

Spent Fuel Pool Safety at Permanently Shutdown Reactors

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

Solid Radioactive Waste Management and Transportation of Radioactive Materials

- The inspectors concluded that the licensee was knowledgeable of the transportation requirements and adequately trained to implement the program. The licensee maintained a solid radioactive waste management and transportation program that met regulatory requirements. (Section 3.2)

Report Details

Summary of Plant Status

On June 12, 2013, the Southern California Edison Company (SCE), the licensee, formally notified the NRC by letter that it had permanently ceased power operations at the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, effective June 7, 2013. The licensee's letter is available in the Agencywide Documents Access and Management System (ADAMS) under (ADAMS Accession No. ML131640201). By letters dated June 28, 2013 (ADAMS Accession No. ML13183A391), and July 22, 2013 (ADAMS Accession No. ML13204A304), the licensee informed the NRC that the reactor fuel had been permanently removed from SONGS, Units 3 and 2, reactor vessels as of October 5, 2012, and July 18, 2013, respectively.

Upon docketing of these certifications, and pursuant to Title 10 of the *Code of Federal Regulations* (CFR) 50.82(a)(2), the SONGS, Units 2 and 3, facility operating licenses no longer authorized operation of the reactors or emplacement or retention of fuel into the reactor vessels. In response to the licensee's amendment request, the NRC issued the permanently defueled technical specifications on July 17, 2015 (ADAMS Accession No. ML15139A390), along with revised facility operating licenses to reflect the permanent cessation of operations at SONGS, Units 2 and 3.

The licensee submitted its Post-Shutdown Decommissioning Activities Report (PSDAR) on September 23, 2014 (ADAMS Accession No. ML14269A033), which is required to be submitted within 2 years following permanent cessation of operations under 10 CFR 50.82(a)(4). The PSDAR outlines the decommissioning activities for SONGS, Units 2 and 3. By letter dated August 20, 2015 (ADAMS Accession No. ML15204A383), the NRC informed the licensee that the PSDAR contained the information required by 10 CFR 50.82(a)(4)(i). In the current plant configuration, the number of operable systems and credible accidents/transients is significantly less than for a plant authorized to operate the reactor or emplace or retain fuel in the reactor vessel. The most recent version of the PSDAR is dated May 7, 2020 (ADAMS Accession No. ML20136A339).

On March 11, 2016, the NRC issued two revised facility operating licenses for SONGS, Units 2 and 3 (ADAMS Accession No. ML16055A522), in response to the licensee's amendment request dated August 20, 2015 (ADAMS Accession No. ML15236A018). The license amendment allowed the licensee to revise its Updated Final Safety Analysis Report (UFSAR) to reflect the significant reduction of decay heat loads in the SONGS, Units 2 and 3, spent fuel pools (SFPs) resulting from the elapsed time since the two units were shut down in January 2012. The licensee shut down Unit 2 for a scheduled refueling outage but never restarted the unit, and the licensee shut down Unit 3 the same month in response to a steam generator tube leak. The revisions support design basis changes made by the licensee associated with the implementation of "cold and dark" plant status as described in the PSDAR.

The NRC approved exemptions from certain emergency planning requirements in 10 CFR 50.47(b), 10 CFR 50.47(c)(2), and 10 CFR Part 50, Appendix E, Section IV, which became effective on June 5, 2015 (ADAMS Accession Nos. ML15105A349 and ML15126A461). These license amendments revised the SONGS emergency action level (EAL) scheme and emergency plan, respectively, to reflect the low likelihood of any credible accident at the plant in its permanently shut down and defueled condition that could result in radiological releases requiring offsite protective measures. The changes to the licenses were to provide conformance with the related exemptions granted to the licensee by NRC letter dated June 4, 2015 (ADAMS

Accession No. ML15082A204). The changes were reviewed, and appropriate conforming changes were properly addressed in the applicable revision and sections of the SONGS UFSAR.

The licensee submitted a license amendment request dated December 15, 2016 (ADAMS Accession No. ML16355A015), to revise the Permanently Defueled Emergency Plan (PDEP) into an Independent Spent Fuel Storage Installation (ISFSI)-Only Emergency Plan (IOEP), and to revise the EAL scheme into ISFSI-only EALs for SONGS, Units 1, 2, and 3 ISFSI. The proposed changes would reflect the new status of the facility, as well as the reduced scope of potential radiological accidents, once all spent fuel has been moved to dry cask storage within the onsite ISFSI.

The NRC issued amendments to the SONGS operating licenses to allow transition to an IOEP and EAL scheme on November 30, 2017 (ADAMS Accession No. ML17310B482). The NRC inspectors determined that the SONGS IOEP and associated changes would provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency at the SONGS facility. The changes were reviewed, and appropriate conforming changes were properly addressed in the applicable revision and sections of the SONGS UFSAR.

License Amendment 169 (Unit 1), 237 (Unit 2), and 230 (Unit 3) were submitted on December 15, 2016, (ADAMS Accession No. ML16355A014) and approved by the NRC by letter dated January 9, 2018 (ADAMS Accession No. ML17345A657). These license amendments changed the operating licenses and technical specifications to reflect the removal of all spent nuclear fuel from the SONGS, Units 2 and 3, SFPs and its transfer to dry cask storage within an onsite ISFSI. These changes will more fully reflect the permanently shutdown status of the decommissioning facility, as well as the reduced scope of structures, systems, and components necessary to ensure plant safety once all spent fuel has been moved to the SONGS ISFSI.

The changes also made conforming revisions to the SONGS, Unit 1, technical specifications and combined them with the SONGS, Units 2 and 3, technical specifications. This license amendment will become effective as of the date the licensee submits a written notification to the NRC that all spent nuclear fuel assemblies have been transferred out of the SONGS SFPs and placed in storage within the onsite ISFSI. In addition, the changes were reviewed, and appropriate conforming changes were properly addressed in the applicable revision and section(s) of the SONGS UFSAR.

On December 20, 2016, the licensee announced the selection of AECOM and EnergySolutions as the decommissioning general contractor for SONGS. The joint venture between the two companies is called SONGS Decommissioning Solutions (SDS). The SDS organization manages the decommissioning activities as the decommissioning general contractor, which is described in the licensee's PSDAR.

The California Environmental Quality Act is the state equivalent of the federal National Environmental Policy Act. For SONGS, the California State Lands Commission (CSLC) performed the California Environmental Quality Act review, which was triggered by the need to establish the final disposition for the offshore conduits that are under a CSLC lease. On February 11, 2019, the Final Environmental Impact Report was released by the CSLC. The CSLC held a public meeting on March 21, 2019, to consider the Final Environmental Impact Report and a lease application to decommission the offshore infrastructure associated with SONGS, Units 2 and 3. On October 17, 2019, the California Coastal Commission approved

with conditions the Coastal Development Permit to begin decontamination and dismantlement of the above grade structures at SONGS, which authorized active decommissioning activities at the site.

After the August 3, 2018, canister misalignment incident at SONGS ISFSI, the licensee committed on August 7, 2018, to an NRC review prior to resuming operations of spent fuel loading operations at SONGS. On July 15, 2019, SONGS resumed spent fuel transfer operations. At the time of this inspection, the licensee was loading and transferring one of the last canisters from the Unit 2 spent fuel pool (SFP) onto the storage pad. The SDS organization had initiated planning for the site's decommissioning activities, which are scheduled to commence once the spent fuel has been moved to the ISFSI.

1 Self-Assessment, Auditing, and Corrective Action at Permanently Shutdown Reactors (40801)

1.1 Inspection Scope

The inspectors reviewed documents and interviewed plant personnel to assess the licensee's performance in the following areas:

- Administrative procedures prescribed actions for the identification, evaluation, and resolution of problems;
- Licensee procedures prescribed thresholds for the performance of self-assessments, audits, and surveillances;
- Licensee management reviewed self-assessments, audits, and corrective actions to remain knowledgeable of plant performance;
- Issues or problems were identified and corrected in accordance with the licensee's corrective action program;
- Quality assurance personnel audited changes in the status of decommissioning and licensee organization; and
- Licensee management observed maintenance and surveillance activities, operations evolutions and training.

1.2 Observations and Findings

Title 10 to the *Code of Federal Regulations* (10 CFR), Part 50, Appendix B, provides the requirements for quality assurance (QA) programs. The licensee established and implemented the Decommissioning Quality Assurance Plan (DQAP) to comply with Appendix B requirements. In addition, the licensee's decommissioning general contractor established and implemented the SONGS Decommissioning Solutions Quality Assurance Program (SDS QAP) to comply with Appendix B requirements.

The inspectors reviewed the licensee's and its contractor's self-assessments, quality auditing, and corrective action programs to ensure that the programs followed regulatory

and procedural requirements. In addition, the inspectors reviewed the site organizational structures for compliance with DQAP and SDS QAP requirements.

a. Self-Assessment Programs

In accordance with Section 13.4 of the Defueled Safety Analysis Report, activities affecting nuclear safety are independently reviewed and audited by site organizations other than those directly responsible for the activity. Independent reviews are conducted by the licensee's Nuclear Oversight Board and Onsite Review Committee. These two independent oversight groups are described in Appendix G of the DQAP.

The Nuclear Oversight Board provided independent reviews of site decommissioning activities. The most recent board report was issued in March 2020. The board did not identify any nuclear safety concerns but provided suggestions for licensee management consideration. The last Onsite Review Committee meeting occurred in August 2019, and the next meeting was scheduled for late-June 2020. The 2019 committee meeting discussed topics related to the Independent Spent Fuel Storage Installation. The licensee conducted routine QA audits of these two oversight groups, most recently in September 2019. The 2019 audit did not identify any negative findings but provided one recommendation regarding clarification of Onsite Review Committee duties and responsibilities.

The licensee and its contractor conducted self-assessments as a best management practice. The licensee's self-assessment program requirements were provided in Procedure SO123-XV-SA-1, "Self-Assessment Process," Revision 10. The contractor's program was described in Procedure SDS-RA1-PCD-0004, "Focused Area Self-Assessment," Revision 4. The procedural instructions included the functional areas to be reviewed and the scheduling of these reviews. The inspectors reviewed representative examples of each type of assessment and concluded that the two self-assessment processes followed the instructions provided in site procedures. The assessments provided useful information to management for self-improvement.

b. Audit Programs

Quality assurance audits are required by 10 CFR Part 50, Appendix B, Criterion XVIII. The instructions for the audit programs are provided in Sections 18 of the licensee's DQAP and the contractor's SDS QAP. Details of the programs are provided in the licensee's Procedure SO123-XII-18.1, "Audit Program Implementation," Revision 29, and the contractor's Procedure SDS-QA1-PCD-0011, "Audit and Surveillance," Revision 4. The inspectors reviewed the licensee's and contractor's implementation of their QA audit programs. Overall, the licensee and its contractor established and implemented comprehensive programs and conducted audits at the frequencies specified in the respective QA plans.

The inspectors reviewed the seven audits issued by the licensee since the last inspection of this program area. The audits identified various findings and weaknesses and offered recommendations as appropriate. Two of seven audits concluded that the program areas were unsatisfactory. These two program areas included documents/ records control and procurement/material control. In response to these two audit conclusions, the licensee issued Action Requests to conduct detailed follow up reviews to understand the reasons for the unsatisfactory conclusions and corrective actions

necessary to restore satisfactory performance. The inspectors reviewed the licensee's response to the two unsatisfactory audit conclusions and confirmed that no actual safety consequences had occurred in the two program areas, and the licensee took corrective actions to address the identified weaknesses.

The licensee's contractor conducted a single comprehensive audit in 2019 that included most program areas required to be audited. The inspectors determined that the contractor's 2019 audit was comprehensive and provided deficiencies, recommendations, and observations for correction or consideration. In addition to audits, the licensee's contractor conducted surveillances between audits. The inspectors reviewed nine surveillances issued in 2019-2020. The surveillances provided useful information that may be included in future audits. At the time of the inspection, the contractor was auditing the environmental, Offsite Dose Calculation Manual, and chemistry programs.

c. Corrective Action Programs

Corrective action programs are required by 10 CFR Part 50, Appendix B, Criterion VXI and Sections 16 of the DQAP and SDS QAP. The inspectors verified that the licensee and its decommissioning general contractor had established and implemented corrective action programs. The inspectors reviewed recent corrective action reports and the licensee's trending of corrective actions to ensure that conditions adverse to quality were being identified and corrected by the licensee and its contractor.

Details of the licensee's corrective action program were provided in Procedure SO123-XV-50, "Corrective Action Program," Revision 46. Details of the contractor's program were provided in Procedure SDS-RA1-PGM-0005, "Corrective Action Program," Revision 4. The inspectors confirmed that the licensee and its contractor had established and implemented corrective action programs in accordance with procedural requirements. The inspectors reviewed selected licensee-issued Action Requests and contractor-issued Condition Reports to ensure that the licensee and its contractor had conducted thorough investigations to identify the causes of events and formulated corrective actions to prevent recurrence of the events. The inspectors concluded that the licensee and its contractor had conducted thorough reviews of the events.

Both the licensee and its contractor established programs to review identified problems for potential trends. Trends are summarized and presented to the licensee's and contractor's Management Review Committees. The inspectors reviewed recent trend reports and confirmed that the licensee and its contractor were identifying and documenting potential trends in their respective corrective action programs.

d. Organizational Structures

The inspectors briefly reviewed the organizational staffing requirements for the QA programs. Details of the staffing requirements are provided in the two QA plans. The licensee's Nuclear Oversight Manager is responsible for the implementation of the DQAP and reports directly to the Chief Nuclear Officer. The contractor's Quality Assurance Manager reports to the Executive Sponsor and is responsible for verifying the proper establishment and effective execution of the SDS QAP. In summary, the licensee and its contractor assigned staff to fill the QA program positions, and the reporting

requirements specified in the two QA plans have been incorporated into the two organizational structures.

1.3 Conclusion

The licensee and its decommissioning general contractor established and implemented self-assessment programs to independently identify, resolve, and prevent problems that may impact nuclear safety and the quality of decommissioning. The licensee and its contractor also implemented QA audit programs that were effective in identifying, resolving, and preventing possible program weaknesses. In addition, the licensee and its contractor established comprehensive corrective action programs to identify, resolve, and prevent problems that may impact nuclear safety and decommissioning. Finally, the licensee and its contractor staffed the QA programs in accordance with the requirements specified in the QA plans.

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

2.1 Inspection Scope

The inspectors reviewed documents and interviewed plant personnel to assess the licensee's performance in the following areas:

- Design, operational, and administrative measures are in place to prevent a substantial reduction in SPF coolant inventory under normal and accident conditions;
- SFP instrumentation, alarms, and leakage detection systems are adequate to assure safe wet storage of spent fuel;
- SFP water chemistry and cleanliness control programs maintain water purity standards, limits on radionuclide concentration, and minimum boron concentration in accordance with the technical specification requirements;
- Criticality controls are consistent with the applicable nuclear criticality safety analyses;
- Procedures, drawings, and PSDAR descriptions and operations regarding the SFP operation and power supplies are adequate; and
- Problem identification issues related to SFP activities are entered into the corrective action program at an appropriate threshold.

2.2 Observations and Findings

The technical specifications specify the limiting conditions of operation (LCO) in the fuel storage pools in order to maintain the fuel in a subcritical condition. The LCOs include Technical Specifications 3.1.1 which specifies a minimum level of 23 feet of water between the top of the fuel bundle and fuel pool surface, and Technical

Specifications 3.1.2 which specifies that the boron concentration will be maintained greater than or equal to 2,000 parts per million (ppm) in order to preserve the assumptions of the fuel handling accident analysis. The inspectors observed that the SFP water level was being maintained approximately 28 feet above of the top of the fuel bundles in both pools, and the boron concentration was maintained at 2583 ppm in Unit 2 and 2582 ppm in Unit 3.

The inspectors reviewed the surveillance history since the last inspection, and the surveillances were completed as required with and no results below the technical specifications identified above. In addition, the SONGS UFSAR, Section 9.1.2.3, Safety Evaluation, required the SFP coolant temperature to be maintained between 50º Fahrenheit (ºF) and 160ºF. The inspectors observed SPF temperatures in Units 2 and 3 as 69.3ºF and 69.8ºF, respectively.

The inspectors observed the SFP island equipment in Units 2 and 3, reviewed the corrective actions generated for the SFP systems, and reviewed surveillances. The inspectors discussed with the operations staff the licensee's observations of the equipment and determined that the SFP island cooling and makeup systems were functioning adequately. The inspectors concluded the systems were being maintained within technical specifications limits. At the time of the inspection, there was no evidence of liner leakage in either the Units 2 or 3 SFPs.

The inspectors observed the radiation monitoring system in the Units 2 and 3 SFP handling building, in addition to the display and alarm capability in the Command Center using the command center data acquisition system.

2.3 Conclusion

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

3 Solid Radioactive Waste Management and Transportation of Radioactive Materials (86750)

3.1 Inspection Scope

The inspectors reviewed documents and interviewed plant personnel to assess the licensee's performance in the following areas:

- Whether the licensee provided detailed instructions and operating procedures for transfer, packaging, and transport of low-level radioactive waste;

- Whether the material was properly classified, described, packaged, marked, and labeled for transportation;

- Whether the licensee used updated and audited procedures when scaling factors or correlation factors are used to quantify the concentration of hard-to-detect radionuclides; and

- Whether shipments made by the licensee were in compliance with NRC and U.S. Department of Transportation regulations.

3.2 Observations and Findings

The inspectors reviewed the waste management program at the plant, which is implemented by SDS using Procedure SDS-WM1-PGM-0001, "Waste Management Program," Revision 10. At the time of this inspection, SDS had shipped multiple packages in 2020. The inspectors reviewed several shipping packages for 2020, training records, and verified the 24-hour emergency telephone number indicated on the shipping papers. The inspectors were able to observe the shipment of the Unit 1 Reactor Pressure Vessel (RPV). Based on discussions with the SDS waste group, the inspectors concluded that the SDS staff were knowledgeable of the waste and transportation requirements.

The inspectors were onsite to oversee activities involving the Unit 1 RPV before transport for disposal in Clive, UT. The inspectors verified the training for the personnel entering the 10 CFR Part 37 security area, reviewed the RPV shipping paperwork, verified the labels and marking on the RPV before it left the site, verified SCE had oversight personnel onsite to oversee the transportation activity in place, and to watch the Unit 1 RPV safely leave the site. The RPV safely left the site via rail, in the early hours of May 25, 2020. The RPV arrived at a railyard in Apex, NV on May 28, 2020 and was transferred to a goldhoper to be transported the rest of the way by road to Clive, UT. The RPV left Apex, NV on June 29, 2020, and arrived in Clive, UT for disposal on July 14, 2020.

The licensee generated 10 CFR Part 61 waste streams for the legacy waste, which included dry active waste (for two time periods dated 2013-2015 and 2016-2018). The waste streams had been decayed to the present time period for shipment. In addition, the licensee generated a waste stream for the Unit 1 RPV shipment. The inspectors reviewed the waste streams generated and the methodology used for the generation of scaling factors to account for difficult-to-measure radionuclides. Based on the review and discussions with the SDS personnel, the inspectors concluded that the methodology was technically sound and provided reasonable assurance that the radionuclide concentrations identified represented the facility's specific data.

Based on discussions with responsible staff and review of representative records, the inspectors concluded that the shippers were knowledgeable of the regulations and demonstrated adequate skills to accomplish the package preparation requirements for public transport. In particular, SDS had conservatively implemented the waste management and transportation programs.

3.3 Conclusion

The inspectors concluded that the licensee was knowledgeable of the transportation requirements and adequately trained to implement the program. The licensee maintained a solid radioactive waste management and transportation program that met regulatory requirements.

4 Exit Meeting Summary

On June 23, 2020, the NRC inspectors presented the final inspection results to Mr. Lou Bosch, Plant Manager, and other members of the licensee's staff. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified with the exception of all SDS procedures and documents reviewed during the inspection, which were marked as proprietary.

SUPPLEMENTAL INSPECTION INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

A. Bates, SCE, Regulatory Affairs and Oversight Manager
S. Mannon, SDS, Regulatory Affairs Manager
A. Wood, SDS, Waste Manager
T. Giard, SDS, Clean Waste Manager
L. Villalobos, SDS, Radwaste Manager
R. Otis, SDS, Quality Assurance Manager
J. Carey, SCE, CAPCO Manager
L. Rafner, SCE, Regulatory Affairs
M. Morgan, SCE, Regulatory Affairs

INSPECTION PROCEDURES USED

IP 40801	Self-Assessment, Auditing, and Corrective Action at Permanently Shutdown Reactors
IP 60801	Spent Fuel Pool Safety at Permanently Shutdown Reactors
IP 86750	Solid Radioactive Waste Management and Transportation of Radioactive Materials

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened/Closed

None

Discussed

None

LIST OF ACRONYMS

ADAMS	Agencywide Documents Access and Management System
ALARA	As Low As is Reasonably Achievable
CFR	*Code of Federal Regulations*
CSLC	California State Lands Commission
DQAP	Decommissioning Quality Assurance Plan
EAL	Emergency Action Level
ISFSI	Independent Spent Fuel Storage Installation
NRC	Nuclear Regulatory Commission
PDEP	Permanently Defueled Emergency Plan
PPM	Parts Per Million
PSDAR	Post-Shutdown Decommissioning Activities Report
QA	Quality Assurance
RPV	Reactor Pressure Vessel
SDS	SONGS Decommissioning Solutions
SCE	Southern California Edison Company
SFP	Spent Fuel Pool
SONGS	San Onofre Nuclear Generating Station
SSC	Structures, Systems, Components
UFSAR	Updated Final Safety Analysis Report