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PG&E Letter DCL-21-056
PG&E Letter DIL-21-006
PG&E Letter HBL-21-015
PG&E Letter HIL-21-003

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

10 CFR 71

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Docket No. 72-26, Materials License No. SNM-2511
Diablo Canyon Independent Spent Fuel Storage Installation
Docket No. 50-133, OL-DPR-7
Humboldt Bay Power Plant
Docket No. 72-27, Materials License Number SNM-2514
Humboldt Bay Independent Spent Fuel Storage Installation

Proposed Revision to the Pacific Gas and Electric Company Quality Assurance Program Approval Form for Radioactive Material Packages No. 0202

- References:
1. NRC Letter "Revised Quality Assurance Program Approval Form for Radioactive Material Packages No. 0202 Revision 8," dated August 13, 2015 (ML15231A222)
 2. PG&E Letter HIL-19-010, "Response to NRC Request for Supplemental Information for the Humboldt Bay Independent Spent Fuel Storage Installation Quality Assurance Plan," dated September 3, 2019 (ML19247E271)
 3. NRC Letter, "Safety Evaluation Report for the Pacific Gas and Electric Company Humboldt Bay Independent Spent Fuel Storage Installation Quality Assurance Plan HBI-L6 Revision 0 (CAC NO. 001028)," dated April 17, 2020 (ML20092L173)

Dear Commissioners and Staff:

In Reference 1, the U.S. Nuclear Regulatory Commission (NRC) issued a revised NRC Form 311, Quality Assurance (QA) Program Approval No. 71-0202, Revision 8 for Diablo Canyon and Humboldt Bay (HB). In accordance with 10 CFR 72.140(d),

Pacific Gas and Electric Company (PG&E) notified the NRC of its plan to adopt the previously approved Humboldt Bay Power Plant (HBPP), 10 CFR Part 50, Appendix B QA Program for the HB Independent Spent Fuel Storage Installation (ISFSI) quality activities. HBPP decommissioning field activities are complete and PG&E plans to request termination of the HBPP 10 CFR Part 50 license and QA Program in 2021. As a result, PG&E submitted Revision 0 of an ISFSI-only HB QA Plan in Reference 2. The HB ISFSI QA Plan satisfies the requirements of 10 CFR Part 72, Subpart G and the requirements of 10 CFR Part 71, Subpart H for the procurement, maintenance, repair, and use of radioactive materials transport packages. In Reference 3, the NRC approved the HB ISFSI QA Plan.

Therefore, PG&E requests the following changes to the PG&E QA Program Approval for Radioactive Material Packages to reflect the transition from a HB, 10 CFR Part 50, Appendix B QA Program to an ISFSI-only 10 CFR Part 72, Subpart G QA Program concurrent with the termination of the HBPP 10 CFR Part 50 license.

1. NRC Form 311, QA Program Approval No. 71-0202, Revision 9
 - a. Revise Block 5 Item 4 to remove the reference to HBPP and reissue the NRC Form 311 to Diablo Canyon Power Plant only. This reference will no longer be applicable after termination of the HBPP Part 50 license.
 - b. Concurrent with the termination of the HBPP 10 CFR Part 50 License, terminate the HBPP 10 CFR Part 50 Appendix B QA Program approval.
2. NRC Form 311, QA Program Approval No. 71-new, Revision 0
 - a. Issue a new and separate NRC Form 311 QA Program Approval for Radioactive Material Packages for the HB ISFSI that references the NRC approved 10 CFR Part 72, Subpart G HB ISFSI QA Program.

Enclosure 1 includes a proposed markup of the revision to NRC Form 311, QA Program Approval No. 71-0202. Enclosure 2 provides a proposed NRC Form 311, QA Program Approval to reflect the stand-alone HB ISFSI QA Plan.

NRC issuance of the revised Reference 1 and the new NRC Form 311 for the HB ISFSI are requested to become effective upon termination of the HBPP 10 CFR Part 50 License.

PG&E makes no new or revised regulatory commitments (as defined by NEI 99-04) in this letter.

If you have any questions or require additional information, please contact Jim Morris at 805-545-4609.

Sincerely,



Maureen R. Zawalick
Vice President, Generation Business and Technical Services

August 31, 2021

Date

Enclosures

cc: Humboldt Distribution
Diablo Distribution
cc/enc: William C. Allen, NMSS Project Manager
Ayesha Athar, NRC Acting Senior Resident Inspector
Samson S. Lee, NRC Project Manager
Scott A. Morris, NRC Region IV Administrator
Gonzalo L. Perez, Branch Chief, California Dept of Public Health
Amy M. Snyder, NRC Reactor Decommissioning Branch Project Manager

Enclosure 1
PG&E Letter DCL-21-056
PG&E Letter DIL-21-006
PG&E Letter HBL-21-015
PG&E Letter HIL-21-003

NRC Form 311
Quality Assurance Program Approval for
Radioactive Material Packages 71-0202

Proposed Revisions
(Mark Up)

NRC FORM 311

U. S. NUCLEAR REGULATORY COMMISSION

1. APPROVAL NUMBER

(10-201907-2045)
10-CFR-74

0202

**QUALITY ASSURANCE PROGRAM APPROVAL
FOR RADIOACTIVE MATERIAL PACKAGES**

REVISION NUMBER

9

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974, as amended, and Title 10, Code of Federal Regulations, Chapter 1, Part 71, and in reliance on statements and representations heretofore made in Item 4 by the organization named in Item 2, the Quality Assurance Program identified in Item 4 is hereby approved. This approval is issued to satisfy the requirements of Section 71.101 of 10 CFR Part 71. This approval is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

2. NAME

Pacific Gas and Electric Company, Diablo Canyon

STREET ADDRESS

77 Beale Street, Mail Code B32

CITY

San Francisco

STATE

CA

ZIP CODE

94105

3. DOCKET NUMBER

71-0202

4. QUALITY ASSURANCE PROGRAM APPLICATION DATE(S)

May 10, 1994; May 28, 1999; April 20, 2004; ~~and~~ September 4, 2009, **August 13, 2015**

5. CONDITIONS

1. Activities conducted with regard to transportation packagings under applicable criteria of Appendix B to 10 CFR Part 50 authorized by this approval: procurement, maintenance, repair, and use. All other activities (i.e., design, fabrication, assembly, testing, and modification) shall be satisfied by obtaining certifications from packaging suppliers that these activities were conducted in accordance with an NRC-approved Quality Assurance Program. It shall remain the responsibility of the Quality Assurance Program holder that all transportation activities meet the requirements of 10 CFR 71.101.
2. Records shall be maintained in accordance with the provisions of 10 CFR Part 71. Specifically:
 - a. Records of each shipment of licensed material shall be maintained for 3 years after that shipment [10 CFR 71.91(a)].
 - b. Records providing evidence of packaging quality shall be maintained for 3 years after the life of the packaging [10 CFR 71.91(d)].
 - c. Records describing activities affecting packaging quality shall be maintained for 3 years after this Quality Assurance Program Approval is terminated [10 CFR 71.135].
3. Planned and periodic audits of all aspects of the Quality Assurance Program shall be conducted in accordance with written procedures or checklists, by appropriately trained personnel not having direct responsibility in the areas being audited, in accordance with 10 CFR 71.137.

~~4. This Quality Assurance Program Approval is applicable to packaging and transportation activities conducted by:~~

Diablo Canyon Power Plant and Humboldt Bay

~~4. This approval is effective upon termination of the Humboldt Bay Power Plant 10 CFR Part 50 License, DPR-7.~~

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

SIGNATURE

DATE

LEIRA CUADRADO PATRICIA SILVA, CHIEF
INSPECTIONS AND OPERATIONS BRANCH
DIVISION OF SPENT FUEL MANAGEMENT
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

Enclosure 2
PG&E Letter DCL-21-056
PG&E Letter DIL-21-006
PG&E Letter HBL-21-015
PG&E Letter HIL-21-003

**Proposed NRC Form 311
Quality Assurance Program Approval for
Radioactive Material Packages**

Humboldt Bay ISFSI

NRC FORM 311
(10-2019)

U. S. NUCLEAR REGULATORY COMMISSION

1. APPROVAL NUMBER
TBD

**QUALITY ASSURANCE PROGRAM APPROVAL
FOR RADIOACTIVE MATERIAL PACKAGES**

REVISION NUMBER
0

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974, as amended, and Title 10, Code of Federal Regulations, Chapter 1, Part 71, and in reliance on statements and representations heretofore made in Item 4 by the organization named in Item 2, the Quality Assurance Program identified in Item 4 is hereby approved. This approval is issued to satisfy the requirements of Section 71.101 of 10 CFR Part 71. This approval is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

2. NAME

Pacific Gas and Electric Company, Humboldt Bay ISFSI

STREET ADDRESS

77 Beale Street, Mail Code B32

CITY

San Francisco

STATE

CA

ZIP CODE

94105

3. DOCKET NUMBER

TBD

4. QUALITY ASSURANCE PROGRAM APPLICATION DATE(S)

April 17, 2020

5. CONDITIONS

1. Activities conducted with regard to transportation packagings under applicable criteria of 10 CFR Part 72, Subpart G authorized by this approval: procurement, maintenance, repair, and use . All other activities (i.e., design, fabrication, assembly, testing, and modification) shall be satisfied by obtaining certifications from packaging suppliers that these activities were conducted in accordance with an NRC-approved Quality Assurance Program. It shall remain the responsibility of the Quality Assurance Program holder that all transportation activities meet the requirements of 10 CFR 71.101.
2. Records shall be maintained in accordance with the provisions of 10 CFR Part 71. Specifically:
 - a. Records of each shipment of licensed material shall be maintained for 3 years after that shipment [10 CFR 71.91(a)].
 - b. Records providing evidence of packaging quality shall be maintained for 3 years after the life of the packaging [10 CFR 71.91(d)].
 - c. Records describing activities affecting packaging quality shall be maintained for 3 years after this Quality Assurance Program Approval is terminated [10 CFR 71.135].
3. Planned and periodic audits of all aspects of the Quality Assurance Program shall be conducted in accordance with written procedures or checklists, by appropriately trained personnel not having direct responsibility in the areas being audited, in accordance with 10 CFR 71.137.
4. This approval is effective upon termination of the Humboldt Bay Power Plant 10 CFR Part 50 License, DPR-7.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

SIGNATURE

DATE

LEIRA CUADRADO, CHIEF
INSPECTIONS AND OPERATIONS BRANCH
DIVISION OF SPENT FUEL MANAGEMENT
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS