



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 13, 2021

Mr. Brad Gacke  
Manager, Rancho Seco Assets  
Sacramento Municipal Utility District  
14440 Twin Cities Road  
Herald CA, 95638

SUBJECT: SAFETY EVALUATION REPORT (SER) FOR THE SACRAMENTO  
MUNICIPAL UTILITY DISTRICT (SMUD) RANCHO SECO QUALTY MANUAL,  
REVISION 5

Dear Mr. Gacke:

By letter dated August 2, 2021 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML21230A269), SMUD requested U.S. Nuclear Regulatory Commission (NRC) approval of "Rancho Seco Quality Manual", Revision 5.

As a result of our review of the proposed revision, NRC staff prepared a SER to document the independent verification against the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 72. The SER in Enclosure 1 contains information regarding the scope of the staff's review and our conclusions for the amended quality assurance program (QAP). The staff found that the revised QAP only contains administrative changes to personnel titles and does not affect the quality program organizational structure. The QAP continues to meet the requirements of 10 CFR Part 72, subpart G, "Quality Assurance". As such, "Rancho Seco Quality Manual", Revision 5 has NRC approval.

In addition, during a review of license documentation, it was noted that a revised NRC Form 311 was never issued to reflect approval of "Rancho Seco Quality Manual", Revision 4 which was submitted in letter to the NRC dated March 30, 2017 (ADAMS Accession No. ML17095A980). This revision of the QAP was approved and went into effect upon termination of the Rancho Seco Nuclear Generating Station Operating License per letter from the NRC dated August 31, 2018 (No. ADAMS Accession No. ML18082B076). Revision 9 of NRC Form 311 documents NRC approval of "Rancho Seco Quality Manual", Revision 5 for governing activities that must adhere to the requirements of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material." The revised NRC Form 311 has been included in Enclosure 2.

If you have any questions regarding this approval of the QAP, please contact me at (301) 287-9527 or Aaron Thomlinson at (830) 255-0994.

Sincerely,

Hipolito J. Gonzalez, Chief  
Inspection and Oversight Branch  
Division of Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 72-11  
EPID ID: 11-01-2021-0003

Enclosure 1:  
Safety Evaluation Report

Enclosure 2:  
NRC Form 311

SUBJECT: SAFETY EVALUATION REPORT (SER) FOR THE SACRAMENTO MUNICIPAL UTILITY DISTRICT (SMUD) RANCHO SECO QUALTY MANUAL, REVISION 5

(EPID ID: 11-01-2021-0003) DOCUMENT DATE: December 13, 2021

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**ADAMS Accession No.: ML21342A169 (PKG.)    ML21342A188 (Letter)**

**\*E-mail**

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<b>DATE:</b>	11/04/2021	11/05/2021	12/13/2021

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**SAFETY EVALUATION REPORT**

**Docket No. 72-11**

**Sacramento Municipal Utility District (SMUD) Rancho Seco Quality Manual, Revision 5**

**SUMMARY**

By letter dated August 2, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21230A269), SMUD requested U.S. Nuclear Regulatory Commission (NRC) approval of "Rancho Seco Quality Manual", Revision 5. The proposed revision continued to establish a quality assurance (QA) program to satisfy each of the applicable criteria in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 72, subpart G as the proposed revision only contains administrative, personnel title changes to those within the organization. No changes to the quality organization structure or responsibilities were proposed.

NRC staff reviewed the application, including relevant supplemental information, using the guidance in NUREG-2215 "Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities," Chapter 15, "Quality Assurance Evaluation," dated April 2020 (ADAMS Accession No. ML20121A190). Based on the statements and representations in the application, as supplemented, the staff concluded that the package meets the requirements of 10 CFR Part 72, subpart G.

The following sections include the staff's evaluation and findings in the areas related to the review.

**EVALUATION**

The NRC's regulation in 10 CFR 72.24(n) has requirements for each application of a license under Part 72 to include a description of the QA program that satisfies the requirements of subpart G. In addition, 10 CFR 72.56 requires, in part, whenever a holder of a specific license desires to amend the license (including a change to the license conditions), an application for an amendment shall be filed with the Commission fully describing the changes desired and the reasons for such changes. The purpose of this evaluation was to review and evaluate the proposed changes made to "Rancho Seco Quality Manual", Revision 5 to assess whether the program continues to comply with the requirements of 10 CFR Part 72, subpart G. The staff reviewed the application, including relevant supplemental information, using the guidance in NUREG-2215 "Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities," Chapter 15, "Quality Assurance Evaluation," dated April 2020 (ADAMS Accession No. ML20121A190).

The proposed changes made to “Rancho Seco Quality Manual”, Revision 5 are as follows:

- 1) Quality Assurance Item III has been revised to reflect the change in the executive delegating the responsibility and authority for developing and executing the Quality Assurance program to the Director, Power Generation. The Chief Zero Carbon Office is the new executive who makes this delegation, replacing the Chief Energy Delivery Officer.
- 2) Criterion I, Section 4.1 was changed to reflect a position title change in the Chief Executive with corporate responsibility for overall safe operation of the Rancho Seco ISFSI. The title changed from General Manager to Chief Executive Officer & General Manager.
- 3) Criterion 1, Section 4.1 was changed to reflect the change in the executive with corporate responsibility for overall safe operation of the Rancho Seco ISFI. The Chief Zero Carbon Officer is the new executive with this responsibility. A clarification is also added that the Director, Power Generation (to whom the Manager, Rancho Seco Assets reports) reports to the Chief Zero Carbon Officer.

## **EVALUATION FINDINGS**

The staff reviewed and evaluated the QAP and concluded that it satisfied the requirements of 10 CFR Part 72, subpart G. The staff assessed that:

- The applicant established and delineated the responsibilities, authorities, and duties of persons, and organizations performing activities affecting quality.
- The applicant’s description of the QA program describes organizations and persons performing QA functions, indicating that sufficient independence and authority should exist to perform their functions without undue influence from those directly responsible for costs and schedules.
- The QA plan provided control over activities affecting quality and ensured conformance to approved design of structures, systems, and components that are important to safety.
- The QA plan defined requirements, procedures, and controls that, when properly implemented, will comply with the requirements of 10 CFR Part 72, subpart G.
- The QA plan satisfied the requirements of 10 CFR 72.24(n).

## **REFERENCES**

1. Sacramento Municipal Utility District Letter to NRC, “Revised Rancho Seco Quality Manual Request for Approval” dated August 2, 2021 (ADAMS Accession No. ML21230A269)

2. NUREG-2215 “Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities,” Chapter 15, “Quality Assurance Evaluation,” dated April 2020 (ADAMS Accession No. ML20121A190)

## **CONCLUSION**

Based on the statements and representations contained in the application, the staff concluded that changes to the Sacramento Municipal Utility District’s “Rancho Seco Quality Manual”, Revision 5 are acceptable and in conformance with the applicable requirements of subpart G to 10 CFR Part 72.

Issued on December 13, 2021.