



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

January 7, 2022

Mr. Bradley Jenkins
Vice President, Utility Operations
Portland General Electric Company
Trojan ISFSI
71760 Columbia River Hwy
Rainier, Oregon 97048

SUBJECT: SAFETY EVALUATION REPORT (SER) FOR REVISION 30 TO PGE-8010,
TROJAN QUALITY ASSURANCE PROGRAM (QAP) AND FORM 311
APPROVAL 0327 REVISION 17 APPROVAL

Dear Mr. Jenkins:

By letter dated October 26, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21309A110), Portland General Electric Company (PGE) requested U.S. Nuclear Regulatory Commission (NRC) approval of proposed Revision 30 to PGE-8010, "Trojan Nuclear Quality Assurance Program."

As a result of our review of the proposed revision, NRC staff prepared an 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 staffs' review and our conclusions for the QAP. No reduction in commitments from the previous revision of the QAP was noted. The QAP continues to meet the requirements of 10 CFR Part 72, subpart G, "Quality Assurance." As such, proposed Revision 30 to PGE-8010, "Trojan Nuclear Quality Assurance Program" has NRC approval.

In addition, Revision 17 of NRC Form 311 for approval 0327 documents NRC approval of proposed Revision 30 to PGE-8010, "Trojan Nuclear Quality Assurance Program" 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.

Upon final PGE approval of PGE-8010 Revision 30, please send the NRC an approved copy with its effective date.

If you have any questions regarding this approval of the QAP, please contact me at (301) 415-5637 or Aaron Thomlinson at (301) 415-7000.

Sincerely,

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

Docket Nos. 72-17 and
71-0327
EPID ID: L-2021-LLQ-0005

Enclosures

1. Safety Evaluation Report
2. NRC Form 311

SUBJECT: SAFETY EVALUATION REPORT (SER) FOR PROPOSED REVISION 30 TO PGE-8010, TROJAN QUALITY ASSURANCE PROGRAM (QAP) AND FORM 311 APPROVAL 0327 REVISION 17 APPROVAL

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UNITED STATES
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SAFETY EVALUATION REPORT
Docket No. 72-17
REVISION 30 TO PGE-8010, TROJAN QUALTY ASSURANCE PROGRAM (QAP)

SUMMARY

By letter dated October 26, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21309A110), Portland General Electric Company (PGE) requested U.S. Nuclear Regulatory Commission (NRC) approval of proposed Revision 30 to PGE-8010, "Trojan Nuclear Quality Assurance Program." 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 did not contain substantive changes. The primary change added flexibility to the organizational structure, allowing for additional positions between the ISFSI Manager and the Corporate Executive Responsible for Trojan. The responsibilities of these two roles in the quality organization, however, remain unchanged from the previous revision of the QAP. Other changes made were primarily administrative or clarifying in nature. No reduction in commitments from the previous revision of the QAP was noted.

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 staffs' 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 is to review and evaluate the proposed changes made in Revision 30 to PGE-8010, "Trojan Nuclear Quality Assurance Program" 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 under Revision 30 to PGE-8010, "Trojan Quality Assurance Program" are as follows:

- 1) Updated Cover Page, Table of Contents and List of Effective Pages to Revision 30.
- 2) Updated Policy Statement list of personnel responsible for complying with this QA Program by adding "authorized contractors and consultants ..."
- 3) Section 1.1: added "and conduct of services" to QA activities that are important to safety.
- 4) Section 1.2.1: added description of allowable additional management position between ISFSI Manager and Corp. Executive and emphasized the unchanged responsibilities of the Corp. Executive.
- 5) Multiple deletions of the word "Department" when referring to "QA audits of ISFSI Department activities."
- 6) Deleted all references to "Surveys" as a clarification because PGE Trojan does not perform Commercial Graded Dedications per 10 CFR Part 21. Added "Surveillances" as an additional tool for assessments to be used as deemed necessary by PGE Trojan.
- 7) Section 1.2.2: added to description of ISRC and deleted "department" from "ISFSI department" as there is no ISFSI department. Added "status and" to mirror wording in 10 CFR 72.144(e) and 71.105(d) to say, "status and adequacy." Listed examples of items that should be included in this "status and adequacy" assessment.
- 8) Section 1.2.3: added "PGE employees" to list of personnel that may provide Nuclear Oversight resources.
- 9) Section 1.2.3.1: added to description of ISRC Member Responsible for Managing Nuclear Oversight Resources.
- 10) Section 1.2.3.2: Deleted "department" from "ISFSI department" as there is no ISFSI department.
- 11) Deleted reference to "Surveys" as a clarification because PGE Trojan does not perform Commercial Grade Dedications per 10 CFR Part 21. Added "Surveillances" as an additional tool for assessments to be used as deemed necessary by PGE Trojan. Added "PGE personnel and ISFSI staff" to list of parties authorized to initiate stop work orders as necessary.
- 12) Added amplifying statement regarding role of Nuclear Oversight resources to provide feedback and consultation to Trojan ISFSI staff inquiries regarding implementation of this QA Program in multiple chapters and sections. Sections 1.2, 4.2, 5.2, 6.2, 7.2, 8.2, 10.2, 11.2, 12.2, 13.2, 14.2, 15.2, 16.2, 17.2.
- 13) Section 1.2.3.3: added description of role and responsibility of additional management position in Trojan organization.

- 14) Section 1.2.4: deleted "department" from "ISFSI department" as there is no ISFSI department, changed to "ISFSI Organization."
- 15) Section 1.2.4.1: added to description and responsibilities of the ISFSI Manager. Added description of allowable additional management position between ISFSI Manager and Corp. Executive and emphasized the unchanged responsibilities of the Corp. Executive.
- 16) Section 1.2.4.2: deleted "department" from "ISFSI department" as there is no ISFSI department, clarified composition of Audit team members, deleted "surveys", and added "surveillances."
- 17) Section 1.2.5.1: added "PGE Corporate" to section header. Added responsibilities to role of PGE Corporate Manager of Nuclear Support Organizations.
- 18) Figure 1.0-1: Updated Trojan ISFSI and QA Program Implementation Functional Organization chart, added legend for line designations.
- 19) Section 2.1: added/cited 10 CFR 72.144(e) and 71.105(d) regarding assessment of status and adequacy of Trojan's QA program.
- 20) Section 2.2.1: Added "ITS" acronym, added reference to Trojan's NRC Part 71 program approval 71-0327.
- 21) Section 4.2: clarified title of PGE Corporate purchasing.
- 22) Section 7.2: deleted "appropriate" and added "compensatory", deleted "surveys", and added "source surveillance."
- 23) Section 7.2.1: Deleted reference to "Surveys" as a clarification because PGE Trojan does not perform Commercial Graded Dedications per 10 CFR Part 21. Added "Source Surveillances" as an additional tool for assessments to be used as deemed necessary by PGE Trojan.
- 24) Section 12.2.1: added "are traceable to the national standards or constants."
- 25) Section 12.2.2: added "out of tolerance" to list of potential as found instrument statuses.
- 26) Section 15.2.3: added detail, "Trojan ISFSI management," who performs reviews and approval of nonconformance reports.
- 27) Section 16.2: Updated to reflect correct terminology used in Trojan's corrective action program; deleted references to "nonconformance reports" and replaced with "corrective action reports (CARs)."
- 28) Section 17.2: added clarifying statement "PGE Corporate Manager for record control services is responsible for ensuring that procedures that implement the applicable portions of the Trojan QA Program are established, implemented, and maintained."
- 29) Section 18.2: deleted "department" from "ISFSI department" as there is no ISFSI department, clarified composition of Audit teams.

30) Glossary: added definitions for Source Surveillance and Tolerance.

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 the 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. Portland General Electric Company letter "Revision 30 to PGE-8010, Trojan Nuclear Quality Assurance Program" dated October 26, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21309A110),
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 under Revision 30 to PGE-8010, "Trojan Nuclear Quality Assurance Program" are acceptable and in conformance with the applicable requirements of subpart G to 10 CFR Part 72.

Issued on January 7, 2022.