



Portland General Electric Company

Trojan ISFSI
71760 Columbia River Hwy
Rainier, Oregon 97048

September 14, 2023
VPN-008-2023

Trojan ISFSI
Docket Nos. 72-017 and 71-0327
License No. SNM-2509

ATTN: Document Control Desk
Director, Division of Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Revision 31 to PGE-8010, Trojan ISFSI Quality Assurance Program

Pursuant to 10 CFR 72.140(b) and (c), 10 CFR 71.101(b) and (c), and 10 CFR 71.106(a), this letter submits for Nuclear Regulatory Commission (NRC) approval proposed Revision 31 to PGE-8010, "Portland General Electric (PGE) Nuclear Quality Assurance Program for Trojan Independent Spent Fuel Storage Installation (10 CFR 72) Operations and Radioactive Material Packaging and Transportation (10 CFR 71) Activities" (Trojan ISFSI QAP).

In addition, this letter also requests the NRC to issue a revision to Form 311, QAP Approval for Radioactive Material Packages No. 0327, to reflect NRC approval of the proposed Revision 31 to the Trojan ISFSI QAP. The current QAP Approval for Radioactive Material Packages No. 0327 is Revision 17.

As required by 10 CFR 170.31 Section 10.B.2, the \$4,200.00 Application Fee, for QA Program Users associated with this 10 CFR 71 QA Program change, accompanies this letter in the form of an "Authorization for Payment by Credit Card" form.

The Trojan ISFSI is the only licensed nuclear facility on the site of the decommissioned Trojan Nuclear Plant. All spent nuclear fuel has been transferred to the ISFSI, the Trojan Nuclear Plant has been dismantled, and the 10 CFR 50 operating license was terminated in 2005. The ISFSI is in a "static" state with no additional dry storage systems (DSSs) to be added. The only activities at the site governed by the Trojan ISFSI QAP involve operations and maintenance of the 34 in-service DSSs (including aging management program implementation), support activities such as procurement, and

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future preparation of the spent fuel canisters for shipment off-site. Security for the ISFSI is conducted under the applicable provisions of 10 CFR 73.

The changes proposed for Revision 31 to the Trojan ISFSI QAP are the outcome of a recent PGE self-assessment of the design and implementation of the Trojan ISFSI QAP for an ISFSI-only site that has completed transfer of all spent fuel to dry storage. That self-assessment revealed opportunities to more clearly focus the QAP on important-to-safety (ITS) activities conducted at the site under 10 CFR 72 and 10 CFR 71, while removing QAP applicability to non-ITS activities. Non-ITS regulatory programs will still be required by the QAP to be implemented via written procedures. Otherwise, the proposed QAP changes are primarily focused on the Organization and Program elements of the QAP.

The proposed revised Trojan ISFSI QAP was developed to comply with all applicable 10 CFR 72 and 10 CFR 71 regulatory requirements using current industry standards and guidance. However, because the industry standards and guidance pertain to either operating nuclear plants or "active" ISFSIs, certain adaptations of the standards and guidance were necessary for an ISFSI-only site where no additional DSSs are being loaded and deployed. These adaptations were informed by other NRC-approved decommissioning site QAPs, including Lacrosse Boiling Water Reactor (LACBWR), Rancho Seco, Crystal River, Fort Calhoun, and the Three Yankees. The following documents were used to develop a customized QAP for the Trojan ISFSI:

- 10 CFR 72, Subpart G, 10 CFR 71, Subpart H, 10 CFR 21
- NRC Regulatory Guide 7.10, "Establishing Quality Assurance Programs for Packaging Used in Transport Of Radioactive Material," Revision 3 (licensee-applicable portions)
- NEI 11-04A, "Nuclear Generation Quality Assurance Program Description"
- NEI-14-05A, "Guidelines for the Use of Accreditation in lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services"
- NEI Efficiency Directive 16-23, "Streamlined Use of Offsite Review Committee"

The key changes included in the attached revised Trojan ISFSI QAP are:

- Replacement of the terms "Quality-Related" and "Augmented Quality" with "Important-to-Safety" and removal from the scope of the QAP activities that are not ITS.
- A revised and simplified organization chart to better reflect ISFSI operations and functional reporting chains. The organization chart has also been relocated to Appendix A.

- Replacement of a standing offsite ISFSI Safety Review Committee (ISRC) with an Independent Management Assessment (IMA) function reporting to the Corporate Executive Responsible for Trojan. The current independent oversight of the Trojan ISFSI is provided by the ISRC. The Trojan ISFSI will transition this function to an IMA process within two years of the approval of this Quality Assurance Program revision. The Corporate Executive Responsible for Trojan will make the determination as to when ISRC activities are concluded. PGE will ensure an effective transition from an ISRC to an IMA.
- Consistent with 10 CFR 72.140(d) "Previously Approved Programs," incorporation of the 10 CFR 71.106(b) QAP change controls directly into the QAP. This proposed change clarifies that changes made to the QAP that do not involve a reduction in commitment may: 1) be implemented without NRC approval and 2) apply to both 10 CFR 72 and 10 CFR 71 ITS activities. This change puts the Trojan ISFSI, operated under a Part 72 specific license, on an equal footing in this regard with ISFSIs operated by Part 72 general licensees and Part 72 specific licensees who still have an active Part 50 license. Both of these types of ISFSI licensees apply their 10 CFR 50, Appendix B QAPs to Part 72 activities on site, and control changes to their ISFSI QAPs under 10 CFR 50.54(a), allowing changes to those QAPs without prior NRC approval if no reduction in commitment is involved.
- Limiting the applicability of 10 CFR 21 to ITS-A items and services. This change is based on a determination that only ITS-A items and services meet the definition of "basic component" in 10 CFR 21.3, as applicable to a Part 72-licensed facility.
- Removal of the glossary from the QAP to a future site procedure.
- Addition of two new appendices. New Appendix B lists regulatory requirements, commitments, and guidance applicable to the QAP. New Appendix C lists regulatory-required site programs that, while not governed by the QAP, will be implemented by written procedures.

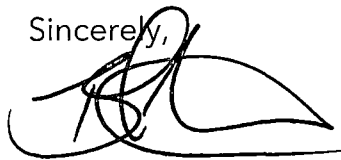
Because this is a substantial re-write of the Trojan ISFSI QAP, individual changes are not identified with revision bars. As mentioned above, the most significant changes are in the "Organization" and "Program" sections, with other sections revised to make conforming changes (e.g., replacing "quality-related" with "ITS"). In some sections, rather than repeat extensive requirements, other documents are incorporated by reference into the QAP. For example, NEI 14-05A is incorporated by reference in Section 12 for acceptance of calibration services for portable M&TE by commercial-grade suppliers.

These proposed changes to the Trojan Nuclear QAP continue to satisfy the requirements of 10 CFR 72 Subpart G and 10 CFR 71 Subpart H for Quality Assurance Programs.

Upon receipt of the NRC approvals requested in this letter, PGE will need to implement the revised QAP with new or revised implementing procedures. Therefore, PGE requests a 180-day implementation period for QAP Revision 31.

If there are any questions regarding this letter, please contact Mr. Tom Romay of my staff at (503) 556-7001.

Sincerely,

A handwritten signature in black ink, appearing to be 'B. Felton', written over a horizontal line.

Benjamin F. Felton
Executive Vice President and Chief Operating Officer

Enclosures

c: Director, NRC Region IV, DNMS
Todd Cornett, Assistant Director, Energy Siting, ODOE