

From: gutherman@comcast.net
To: [Raju Patel](#)
Cc: "[Tom Sanders](#)"; [Hector Rodriguez \(They/Them/Theirs\)](#); "[Heath Low](#)"
Subject: [External_Sender] RE: RE: RE: RE: Trojan QAP
Date: Monday, March 4, 2024 6:25:08 PM
Attachments: [image001.png](#)

Raju,

Yes, I can confirm that. The approval of the 9/14/23 submittal via the senior executive responsible for Trojan signing the submittal cover letter indicates his approval of the contents of the submittal (proposed PGE-8010, Revision 31). It was presented to him for approval after a rigorous review and approval process at the line level, through the ISFSI Manager.

This is the final version of the document we wish NRC to review and approve. That is, if the NRC approves this version, as submitted, we will issue it in-house as Revision 31 unaltered and complete the required traveler paperwork indicating NRC approval has been sought and received. If changes are required as a result of NRC review (i.e., RAIs), it will be re-submitted to NRC as an update to proposed Revision 31, and the same process described above will be implemented after approval.

Regards,

Brian

From: Raju Patel <Raju.Patel@nrc.gov>
Sent: Monday, March 4, 2024 1:24 PM
To: gutherman@comcast.net
Cc: 'Tom Sanders' <tom.sanders@pgn.com>; Hector Rodriguez (They/Them/Theirs) <Hector.Rodriguez-Luccioni@nrc.gov>; 'Heath Low' <heath.low@pgn.com>
Subject: RE: RE: RE: RE: Trojan QAP

Hello Mr. Gutherman,

Lastly, can you confirm that the Trojan ISFSI Quality Assurance Program PGE-8010 proposed revision 31 submitted to the NRC for review has been reviewed and approved by PGEC management and this proposed Revision 31 is the final document for the NRC to review and approve?

Thank you,

Raju B Patel

Transportation and Storage Safety Inspector
Inspection and Oversight Branch
Division of Fuel Management
Office of Nuclear Material Safety and Safeguards
Office Phone# (301) 415-3511
Mail Stop: T-4B16



From: gutherman@comcast.net <gutherman@comcast.net>

Sent: Monday, March 4, 2024 11:40 AM

To: Raju Patel <Raju.Patel@nrc.gov>

Subject: [External_Sender] RE: RE: RE: Trojan QAP

Thank you, Raju.

BG

From: Raju Patel <Raju.Patel@nrc.gov>

Sent: Monday, March 4, 2024 11:29 AM

To: gutherman@comcast.net

Cc: 'Tom Sanders' <tom.sanders@pgn.com>; Hector Rodriguez (They/Them/Theirs) <Hector.Rodriguez-Luccioni@nrc.gov>; 'Heath Low' <heath.low@pgn.com>

Subject: RE: RE: RE: Trojan QAP

Hello Brian,

Thank you for your response. I shall get back to you within few days regarding your request.

Thanks,

Raju B Patel

Transportation and Storage Safety Inspector
Inspection and Oversight Branch
Division of Fuel Management
Office of Nuclear Material Safety and Safeguards
Office Phone# (301) 415-3511
Mail Stop: T-4B16



From: gutherman@comcast.net <gutherman@comcast.net>
Sent: Friday, March 1, 2024 1:36 PM
To: Raju Patel <Raju.Patel@nrc.gov>
Cc: 'Tom Sanders' <tom.sanders@pgn.com>; Hector Rodriguez (They/Them/Theirs) <Hector.Rodriguez-Luccioni@nrc.gov>; 'Heath Low' <heath.low@pgn.com>
Subject: [External_Sender] RE: RE: Trojan QAP

Raju,

We will look into your request. But I would note that on October 26, 2021, PGE sent in QAP Revision 30 for NRC review in the same manner. That is, a cover letter signed by the VP and a markup of the QAP with neither the document signed nor the policy statement signed. Those ADAMS Accession Numbers are ML21309A110, 111, and 112. The revision was reviewed and approved by the NRC.

We simply followed the same protocol for Revision 31. Can you help me understand why it appears the requirements for a QAP submittal are changing? As I mentioned previously, PGE's procedures don't allow them to sign a QAP revision that requires NRC approval until that approval is acquired. We're kind of in a jam here and hoping you could follow the same process NRC did in 2021.

Have a nice weekend.

Brian

From: Raju Patel <Raju.Patel@nrc.gov>
Sent: Friday, March 1, 2024 9:08 AM
To: gutherman@comcast.net
Cc: 'Tom Sanders' <tom.sanders@pgn.com>; Hector Rodriguez (They/Them/Theirs) <Hector.Rodriguez-Luccioni@nrc.gov>; Heath Low <heath.low@pgn.com>
Subject: RE: RE: Trojan QAP

Good Morning Mr. Gutherman,

Thank you for your quick response and proposals. Kindly follow the requirements of 10 CFR 72.11 as stated in the regulations. NRC does not accept documentations submitted by applicant/CoC holder/Licensee that have not been reviewed and approved by their management. Please submit a Trojan QAP that has been reviewed and approved by Trojan's management along with the Policy statement.

Thank you,

Have a wonderful day.

Raju B Patel

Transportation and Storage Safety Inspector
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Mail Stop: T-4B16



From: gutherman@comcast.net <gutherman@comcast.net>
Sent: Thursday, February 29, 2024 12:00 PM
To: Raju Patel <Raju.Patel@nrc.gov>
Cc: 'Tom Sanders' <tom.sanders@pgn.com>; Hector Rodriguez (They/Them/Theirs) <Hector.Rodriguez-Luccioni@nrc.gov>; Heath Low <heath.low@pgn.com>
Subject: [External_Sender] RE: Trojan QAP

Hi Raju. I understand your question and request, but due to procedural

requirements at Trojan, we are not able to sign a QAP revision that requires NRC approval before we receive that NRC approval. We understand that the requirement for submittals to the NRC lies in 10 CFR 72.11 – the information must be complete and accurate in all material respects. The proposed Revision 31 has been through a rigorous review process at the site to ensure that requirement is met. You can be assured that the submittal is complete and accurate, as required by 10 CFR 72.11, by virtue of the senior executive responsible for Trojan signing the September 13, 2023, cover letter for the original submittal.

Keeping the document as proposed Revision 31 through the NRC review has the additional benefit of allowing us to incorporate any changes that may be required as a result of NRC's review (e.g., any RAIs), without cycling the document revision number, which has implications here internally. I suggest two alternatives to address your request:

1. Once we receive the update to our 71-327 form indicating approval, we will have the VP sign Revision 31 of the QAP and the policy statement, subject to the implementation period we need to revise and issue procedures. We will, of course, send the NRC a copy of that signed version.
2. As an alternative, if you need a final, signed Revision 31 on your end to issue the 71-0327 approval, toward the end of the review we could look at our procedures and see if there is a way we could submit a signed version as the version you are approving (i.e., there will be no more changes). That version would include any changes resulting from the review.

Are either of these approaches acceptable?

Brian

Sent: Thursday, February 29, 2024 8:50 AM

To: gutherman@comcast.net

Cc: 'Tom Sanders' <tom.sanders@pgn.com>; Hector Rodriguez (They/Them/Theirs) <Hector.Rodriguez-Luccioni@nrc.gov>

Subject: RE: Trojan QAP

Good Morning Mr. Gutherman,

Please make sure the QAPD that is being submitted (clean copy) is following the requirements of 10 CFR Part 71, Subpart H and 10 CFR Part 72, Subpart G, subsections 71.113 and 72.152, "Document Control."

It's the NRC's expectation to have all applicant/CoC holder/Licensee to submit complete documents for NRC review and approval. Please make sure the QAPD that Trojan is submitting is not a draft or proposed document. It should be reviewed and approved by Trojan's management along with the Policy statement. Please let me know if you need any clarification.

Thank you,

Raju B Patel

Transportation and Storage Safety Inspector
Inspection and Oversight Branch
Division of Fuel Management
Office of Nuclear Material Safety and Safeguards
Office Phone# (301) 415-3511
Mail Stop: T-4B16



From: gutherman@comcast.net <gutherman@comcast.net>

Sent: Friday, February 23, 2024 9:01 AM

To: Raju Patel <Raju.Patel@nrc.gov>

Cc: 'Tom Sanders' <tom.sanders@pgn.com>

Subject: [External_Sender] Trojan QAP

Hi Raj. I have spoken with PGE about the submitting a version of proposed QAP Revision 31 showing deletions as well as insertions. I need to get the Word

versions of both revisions and make a “compare documents” file in Word to create the version you requested. It may be a little messy because there were some formatting changes in the document template. But you will be able to see the deletions in the QAP text.

By the time we get that done and a submittal letter drafted and signed, it will likely be at least mid-next week. Thank you for your patience.

Brian Gutherman

President

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