



Doug Bauder  
Chief Nuclear Officer and  
Vice President, Decommissioning

May 17, 2019

Scott A. Morris,  
Regional Administrator  
U.S. Nuclear Regulatory Commission, Region IV  
1600 E. Lamar Blvd.,  
Arlington Tx, 76011

**SUBJECT: Docket Nos. 50-206, 50-361, 50-362 and 72-41  
Resumption of Fuel Transfer Operations  
San Onofre Nuclear Generating Station (SONGS),  
Units 1, 2, 3, and ISFSI**

- REFERENCES:
1. Letter from Mr. D. Bauder (SCE) to the Director, Office of Enforcement (NRC) dated December 26, 2018; Subject: Docket Nos. 50-206, 50-361, 50-362 and 72-41, Reply to a Notice of Violation, EA-18-155, San Onofre Nuclear Generating Station (SONGS) Units 1, 2, 3, and ISFSI, (ADAMS Accession No. ML18362A148)
  2. Letter from Mr. D. Bauder (SCE) to the Director, Office of Enforcement (NRC) dated April 23, 2019, Subject; Docket Nos. 50-206, 50-361, 50-362 and 72-41, Reply to a Notice of Violation, EA-18-155, and Statement of Method of Payment, San Onofre Nuclear Generating Station (SONGS) Units 1, 2, 3, and ISFSI, (ADAMS Accession No. ML19116A056)
  3. Southern California Edison Company; San Onofre Nuclear Generating Station, Pre-Decisional Enforcement Conference Slides, dated January 24, 2019 (ADAMS Accession No. ML19023A033)
  4. Letter from Scott A. Morris (NRC) to D. Bauder (SCE) dated March 25, 2019; Subject: Notice of Violation and Proposed Imposition of Civil Penalty - \$116,000 and NRC Special Inspection Report 050-00206/2018-005, 050-00361/2018-005, 050-00362/2018-005, 072-00041/2018-001 (ADAMS Accession No. ML19080A208)

Dear Sir,

Before Fuel Transfer Operations (FTO) at the San Onofre Nuclear Generating Station (SONGS) can recommence, appropriate corrective actions must be implemented, and the NRC must be satisfied that all issues have been resolved related to the August 3, 2018 canister download event. Based on recent inspection interactions, technical meetings and docketed correspondence, SCE understands that NRC concerns related to resumption of FTO at SONGS have been sufficiently addressed.

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Since the time of the event, SONGS has completed cause evaluations and implemented important corrective actions. The corrective actions are summarized in SCE's replies to violations stemming from the August 3<sup>rd</sup>, 2018 event (References 1 and 2), as well as in presentation materials from the Pre-Decisional Enforcement Conference held on January 24, 2019 (Reference 3). The NRC performed follow-up inspections onsite to review the corrective actions and observe dry-run demonstrations implementing the corrective actions during the weeks of January 28 and February 11, 2019. SCE understands that the NRC is satisfied with the corrective actions.

During inspections related to the August 3, 2018 event, the NRC expressed concern regarding the potential for wear on Multi-Purpose Canisters (MPCs) during the download process. The Holtec UMAX Final Safety Analysis Report (FSAR), Revision 4, contained statements that there is "no risk of scratching or gouging" of MPCs due to the vertical download process. As the NRC stated in a Notice of Violation and Proposed Imposition of Civil Penalty (Reference 4): (1) the initial calculations and evaluation to resolve the apparent inconsistency did not contain an adequate basis to support the change to the FSAR, (2) SCE had initiated corrective actions to re-perform the 72.48 evaluation, and (3) the NRC would review the subsequent evaluation to determine if the FSAR change would be acceptable.

SCE performed a visual assessment of a series of loaded canisters using robotic, specialized, precision camera equipment to measure surface defects. A statistical evaluation was performed based on the wear marks observed for each MPC. Based on the results of the visual assessment and associated statistical evaluation, SCE has concluded that given the potential for wear due to incidental canister contact, there is ample margin of safety under stringent American Society of Mechanical Engineers Boiler and Pressure Vessel Code requirements for canister integrity. SCE understands that the NRC agrees with this conclusion. A site-specific resolution to this issue was developed which included a revision to the 10 CFR 72.212 evaluation and a new 10 CFR 72.48 screening. The 72.212 revision includes an exception to text in Revision 4 of the UMAX FSAR regarding the risk of scratching and gouging, and acknowledges that incidental contact does occur at SONGS.

SCE considers the issues related to the August 3, 2018 event and subsequent inspections to have been resolved to the NRC's satisfaction. As a result, SCE intends to begin preparations to resume FTO. These preparations will include, at a minimum, a final readiness review assessment by SCE management to ensure that worker training is completed, ensuring qualifications are in place, and completing equipment checks in order to ensure safe and compliant FTO activities. Upon completion of these readiness activities, SCE intends to resume FTO. SCE will verbally notify the NRC when final readiness to resume FTO is achieved, but prior to resuming FTO. SCE looks forward to additional NRC inspection activities throughout the fuel transfer process.

There is a regulatory commitment provided in the enclosure of this letter.

If you have any questions or require additional information, please contact me or Mr. Albert Bates, at (949) 368-6945.

Sincerely,



Vince Blouster for Doug Bander, CNO

Enclosure: Regulatory Commitment

cc: Document Control Desk  
M. Vaaler, NRC Project Manager, SONGS Units 1, 2 and 3

ENCLOSURE  
REGULATORY COMMITMENT

This table identifies actions discussed in this letter for which Southern California Edison commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are not commitments.

Commitment No.	Verbatim Commitment	Type	Scheduled Completion Date
2019-001	SCE will verbally notify the NRC when final readiness to resume FTO is achieved, but prior to resuming FTO.	One-Time	Prior to resuming FTO.