UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005

February 19, 2003

Mr. James Shetler, Assistant General Manager
Energy Supply
Sacramento Municipal Utility District
6201 'S' Street
P.O. Box 15830
Sacramento, California 95852

SUBJECT: NRC INSPECTION REPORT 50-312/2003-001

Dear Mr. Shetler:

An NRC inspection was conducted January 27-30, 2003, at your Rancho Seco Nuclear Generating Station. The enclosed report presents the scope and results of that inspection.

The purpose of the inspection was to review compliance with federal regulations, your license and technical specifications concerning facility decommissioning activities. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel. No violations of NRC regulations were identified during the inspection.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, if you provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Should you have any questions concerning this inspection, please contact Emilio M. Garcia at (530) 756-3910 or the undersigned at (817) 860-8191.

Sincerely,

/RA/

D. Blair Spitzberg, Ph.D., Chief
Fuel Cycle and Decommissioning Branch

Docket Nos.: 50-312
License Nos.: DPR-54

Enclosure:
NRC Inspection Report
050-312/2003-01

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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No.:	50-312
License No.:	DPR-54
Report No.:	50-312/2003-001
Licensee:	Sacramento Municipal Utility District
Facility:	Rancho Seco Nuclear Generating Station
Location:	14440 Twin Cities Road Herald, California
Dates:	January 27-30, 2003
Inspector:	Emilio M. Garcia, Health Physicist Fuel Cycle and Decommissioning Branch
Approved By:	D. Blair Spitzberg, Ph.D., Chief Fuel Cycle and Decommissioning Branch
ADAMS Entry :	IR 05000312-03-001 on 01/27-30/03; Sacramento Municipal Utility District; Rancho Seco Nuclear Generating Station. Decommissioning Report; No Violations.

EXECUTIVE SUMMARY

Rancho Seco Nuclear Generating Station
NRC Inspection Report 50-312/2003-001

All spent fuel had been removed from the spent fuel pool to the Independent Spent Fuel Storage Installation (ISFSI). The licensee was continuing their dismantling activities in the reactor, auxiliary, and spent fuel buildings. The licensee had shipped 3 of 11 spent fuel pool racks to a disposal site.

Organization, Management and Cost Controls

- All the managerial positions were staffed with individuals with many years of service with the licensee and they appeared to be familiar with their responsibilities (Section 1).

- The licensee had a program that allowed any employee or contractor employee to raise safety concerns to the licensee. Individuals interviewed appeared to be willing to raise any safety concerns they might have to senior managers and they were aware of the safety concerns program (Section 1).

- The licensee had submitted complete and timely annual decommissioning funding status reports in 2001 and 2002. The licensee projects sufficient funding to complete the decommissioning (Section 1).

Safety Reviews

- The licensee had a program for conducting safety evaluations as permitted by 10 CFR 50.59 (Section 2).

- Safety evaluations appeared to have been performed as required by the licensee's procedures and the regulations (Section 2).

Maintenance and Surveillance

- With the movement of all the fuel from the spent fuel pool to the ISFSI, all surveillance requirements had been removed from the technical specifications. Some surveillance requirements existed in other documents such as the quality manual and the offsite dose calculation manual (Section 3).

- Records reviewed indicated that surveillances were being performed as required (Section 3).

Decommissioning Performance and Status Review

- The licensee was continuing their dismantling activities in the reactor, auxiliary, and spent fuel buildings (Section 4).

Solid RadWaste Management & Transportation of Radioactive Materials

- The licensee had shipped 3 of 11 spent fuel racks for disposal and planned on shipping the remaining 8 racks in the next few weeks (Section 5).

- At the waste disposal site, during the removal of a fuel rack from the shipping box, a lift sling was cut and the rack fell on the shipping box. There were no personnel injuries nor environmental releases (Section 5).

Report Details

Summary of Facility Status

The Rancho Seco facility was undergoing active decommissioning with dismantlement work in the auxiliary, reactor and spent fuel buildings. In addition, the licensee had removed all 493 spent fuel assemblies from the spent fuel pool. Twenty-one canisters had been loaded with spent fuel and transferred to the Independent Spent Fuel Storage Installation (ISFSI).

Overall, site decommissioning work was progressing safely with significant work completed since the last NRC inspection. Good radiological controls by the health physics personnel in the reactor, auxiliary and spent fuel buildings were observed during the tours of work activities. The amount of material awaiting removal from the work areas was adequately controlled with no backlog of scrap observed that would present a safety hazard to workers in the area.

1 Organization, Management and Cost Controls

1.1 Inspection Scope

The inspector reviewed the licensee's organizational structure, employee/safety concern program and cost management information to ascertain whether these management systems provided the proper control, evaluation, and management of power reactor decommissioning activities.

1.2 Observations and Findings

a. Organization

With the relocation of all the spent fuel to the ISFSI and the issuance of license Amendments 129 and 130, most remaining former Part 50 technical specification requirements were moved to the Rancho Seco Quality Manual (RSQM), including the requirements for the plant organization. RSQM-Section I, Organization, describes the organization and associated responsibilities. Principal responsibilities reside with the general manager through the assistant general manager (AGM) Energy Supply. The manager, plant closure and decommissioning (plant manager) reports directly to the AGM, Energy Supply, and has day-to-day responsibilities for facility staffing, budgeting, and that staff safely carry out their responsibilities. He also assures that staff respond to the commitment management review committee (CMRG) safety review recommendations and coordinates quality concerns with quality assurance. RSQM-Section I, also states that quality assurance is headed by the quality assurance/licensing/administration/training superintendent who reports to the plant manager, but has the authority to take any quality issue directly to the AGM, Energy Supply. This procedure also describes in general terms the responsibilities of the CMRG and refers the reader to specific procedures. Finally, RSQM-Section I, also refers the reader to Rancho Seco Administrative Procedure (RSAP) 0101, Nuclear Organization Responsibilities and Authorities, for more details on corporate and onsite organization responsibilities.

RSAP-0101, in part, identifies six managers reporting to the plant manager and describes their responsibilities. These were: (1) the decommissioning project manager; (2) the quality assurance/licensing/administration/training superintendent; (3) the maintenance superintendent; (4) the engineering superintendent; (5) the decom/operations superintendent; (6) the radiation protection/chemistry superintendent. In addition, this procedure describes the district supervisor, security operations, who reports to a corporate position separate from the plant manager's line of authority. A security specialist provides a liaison function between the plant manager and the district supervisor, security operations. A organizational chart attached to RSAP-0101 also listed three other positions that report to the quality assurance/licensing/administration/training superintendent: (1) the special nuclear materials manager; (2) the training supervisor; and (3) the safety specialist. Not listed in this procedure but of significance is the staff for the ISFSI. This staff consists of five ISFSI technicians that report to an ISFSI supervisor. This organization reports to the decom/operations superintendent. At the time of the inspection all the managerial positions were staffed with individuals with many years of service with the licensee. The additional positions were also staffed. In interviews conducted by the inspector, individuals appeared to be familiar with their responsibilities.

b. Employee/Safety Concern Program

The NRC Policy Statement of Nuclear Employees Raising Safety Concerns without Fear of Retaliation includes the recommendation for licensees and their contractors to identify processes that employees may use to raise safety concerns through normal and alternative channels. At Rancho Seco this process is controlled by procedure RSAP-1308, Potential Deviation from Quality, also known as the PDQ process. Procedure RSAP-1308, states that any personnel working at Rancho Seco who identifies any condition that is unexpected, unsafe, does not meet requirements, or is not the result of normal wear can initiate a PDQ. The inspector observed signs posted throughout the facility that reminded personnel, "When in doubt, write a PDQ." The PDQ is the baseline document for the Rancho Seco Corrective Action Program. Section 6.8 of procedure RSAP-1308, provides an alternative means to raise safety concerns, the PDQ may be anonymous. Although the procedure permits the PDQ form to exclude the name of the individual raising the concern it does require the individual to (1) go to the quality group area to enter their concern in the PDQ log, (2) contact the ISFSI technician to report the problem and (3) deliver the PDQ to the commitment management review group coordinator or another quality group member. The inspector also observed that on January 30, 2003, there were no blank PDQ forms available in the quality group area forms holder. The quality assurance/licensing/administration/training superintendent stated that any PDQ would be considered and reviewed even if these steps were not followed, and he promptly arranged for blank copies of the PDQ to be added to the quality groups form holder. He further stated that the procedure would be reviewed in light of the inspector's comments.

The inspector selected five individuals from those observed onsite to interview regarding their knowledge of the PDQ process. All these individuals indicated that they felt comfortable bringing any concerns they might have to their supervisors. All of the employees were aware that they could always initiate a PDQ or bring concerns to the

NRC's attention. All indicated that they had received training on the program sometime while working for the licensee. Two of the five individuals interviewed had personal involvement with the PDQ process. One had received feedback, the other had not. The NRC Policy Statement also states that the Commission expects licensee safety concerns programs to provide appropriate feedback to employees. Procedure RSAP-1308 does not specify the means that Rancho Seco will used to provide appropriate feedback to the employees raising safety concerns. The quality assurance/licensing/administration/training superintendent stated that it was the licensee's practice to provide feedback to the PDQ originator but that the licensee would review the procedure in light of the inspector's comments. During another unrelated interview an employee informed the inspector that he/she would be reluctant to bring safety concerns through their reporting chain, but that he/she felt comfortable bringing the matter to the plant manager. A total of 89 PDQs were opened in 2002 and two in 2003 as of January 30. None of these PDQs were anonymous. All of these PDQs had been reviewed by the CMRG or its predecessor and had been resolved or were being resolved.

The inspector concluded that the licensee had a program for any individual to raise safety concerns to the licensee, that licensee personnel were willing to raise concerns to senior managers and that they were aware of the licensee's safety concerns program. The inspector noted some areas for improvement.

c. Cost Controls

10 CFR 50.75(f)(1) requires, in part, that each power reactor licensee with a reactor already closed, submit a report on a calendar-year basis of (1) the amount of decommissioning funds estimated to be required for decommissioning; (2) the amounts accumulated to the end of the preceding calendar year; (3) a schedule of annual amounts remaining to be collected; (4) the assumptions used regarding the rates of escalation in decommissioning cost; (5) the rates of earnings on decommissioning funds; (6) rates of other factors used in funding projections; (7) any contracts upon which the licensee is relaying; (8) any modifications occurring to a licensee's current method of providing financial assurance since the last report; and (9) any material changes since the last report to trust agreements. This regulation also requires these annual reports be submitted by March 31 of each year. The inspector reviewed the annual reports submitted in 2001 and 2002, and discussed cost controls with the licensee's decommissioning/nuclear project control coordinator. These reports included information on the nine items that 10 CFR 50.75(f)(1) requires to be reported. The reports were submitted prior to March 31 of each year, as required.

The licensee's decommissioning/nuclear project control coordinator stated that the licensee internally updated their cost estimates twice per year and had estimated cost through 2031. Sacramento Municipal Utility District was committed to adding $27,000,000 per year to the trust fund through 2008, and had a balance of approximately $86,198,000 as of the end of calender year 2002. The decommissioning/ nuclear project control coordinator stated that the licensee projects sufficient funding to complete the decommissioning.

1.3 Conclusion

All the managerial positions were staffed with individuals with many years of service with the licensee and they appeared to be familiar with their responsibilities. The licensee had a program for any individual to raise safety concerns to the licensee. Licensee personnel interviewed appeared to be willing to raise any safety concerns they might have to senior managers and they were aware of the licensee's safety concerns program. The licensee had submitted complete and timely annual decommissioning funding status reports in 2001 and 2002. The licensee projects sufficient funding to complete the decommissioning.

2 Safety Reviews, Design Changes, and Modifications

2.1 Inspection Scope

The inspector reviewed selected 50.59 reviews and changes to the licensee's safety review process as a result of the relocation of spent fuel from the storage pool to the ISFSI.

2.2 Observations and Findings

With the relocation of all the spent fuel to the ISFSI and the issuance of license Amendments 129 and 130, most remaining Part 50 technical specification requirements were moved to Appendix A of the Rancho Seco Quality Manual, including the requirements for technical reviews and control. These amendments also eliminated the plant review committee, the management safety review committee, and established a single commitment management review committee (CMRG). The CMRG functions and responsibilities were described in procedure RSAP-0260, Commitment Management Review Group and Commitment Tracking System. Section 6.9.1 of RSAP-0260 states, in part, that the CMRG is responsible for 10 CFR 50.59 evaluations pursuant to RSAP-0901, Safety Review of Proposed Changes, Test, and Experiments. Membership of the CMRG was described in Section 5 of RSAP-0260, and included the plant manager, all the plant superintendents, the supervising quality engineer, and the decommissioning project manager. On January 30, 2003, the inspector observed a CMRG meeting that reviewed a potential deviation from quality (PDQ).

The changes in plant status also resulted in a decrease in the number of changes, tests, experiments and modifications that are subject to review as unreviewed safety questions. The inspector reviewed the CMRG minutes for the period of August 26, 2002, through January 8, 2003. These minutes indicated that during this time the licensee had conducted five safety reviews, three of which were 50.59 evaluations and the other two were 72.48 evaluations. The inspector reviewed the three 50.59 evaluations conducted during that period. The packages appeared complete and were signed by a qualified reviewer and the plant manager for the CMRG. The inspector noted that the minutes of the CMRG indicated that these evaluations had been reviewed, discussed and unanimously approved by the CMRG.

2.3 Conclusion

The licensee had a program for conducting safety evaluations as permitted by 10 CFR 50.59. Safety evaluations appeared to have been performed as required by the licensee's procedures and the regulations.

3 Maintenance and Surveillance (62801)

3.1 Inspection Scope

The inspector reviewed selected records of maintenance and surveillance activities, and interviewed cognizant personnel.

3.2 Observations and Findings

The inspector interviewed cognizant personnel, reviewed the revised Part 50 technical specifications, the quality manual, the offsite dose calculation manual (ODCM) and reviewed the master surveillance schedule. No surveillance or routine test was overdue. The annual emergency lighting test had identified some lights that had failed and a PDQ was open to correct the problem. With the movement of all spent fuel out of the spent fuel pool and to the ISFSI, all the Part 50 technical specification surveillances had been eliminated. Some surveillances remain in the quality manual and ODCM. The inspector selected 10 surveillance records for review. These records involved four different surveillances. These surveillances had been conducted as required by their associated procedure and had not identified any problems.

3.3 Conclusion

With the movement of all the fuel from the spent fuel pool to the ISFSI, all surveillance requirements had been removed from the technical specifications. Some surveillance requirements existed in other documents such as the quality manual and the ODCM. Records reviewed indicated that surveillances were being performed as required.

4 Decommissioning Performance and Status Review (IP 71801)

4.1 Inspection Scope

The licensee's dismantlement activities were reviewed. Tours of the site were conducted to observe work activities underway, including observation of housekeeping, safety practices, fire loading and radiological controls.

4.2 Observations and Findings

Tours of the reactor, auxiliary, and spent fuel buildings, and other areas of the plant were conducted to observe dismantling and decommissioning activities in progress. The work observed was being conducted in a safe and orderly manner. Radiological controls, including postings and barriers, were in place as needed. The inspector noted

good housekeeping and fire protection practices. Major activities observed are noted below under each facility area.

a. Reactor Building

The removal of the internal penetration for the main feed water piping support was observed. The inspector also observed attempts at de-tensioning the reactor head studs. The licensee was also removing control rod drive mechanisms from the top of the reactor head. Additional work observed was the removal of some conduits. The inspector noted that access to areas where grating had been removed had been covered or a personnel barrier placed to prevent falls. The inspector noted good housekeeping, radiological and fire protection practices.

b. Auxiliary Building

The asbestos removal of the concentrated boric acid storage tank was completed and the licensee was conducting segmentation and removal of the concentrated boric acid storage tank. The only remaining major components in the auxiliary building were two additional large tanks in the underground tank farm. The inspector noted good housekeeping, radiological and fire protection practices.

c. Spent Fuel Building

The water level had been lowered to about 6 feet from the bottom of the pool. The spent fuel pool chiller skid had been removed from the building. The fifth spent fuel storage racks had been vacuumed, decontaminated by water lance, radiologically surveyed, covered in plastic shrink rap and removed from the fuel handling building. Six additional racks remained to be cleaned, decontaminated and removed from the building. The licensee had completed shipment of three of the racks to a disposal site. Planning for the segmentation of the stainless steel liner was progressing. Results of the analysis of 5 concrete cores at the 22 feet above the bottom of the pool had been received by the licensee. The analysis indicated that the radiological contamination extended at most to 4 inches into concrete at this elevation. The licensee was planning on collecting additional cores near the bottom of the pool and on the bottom once the pool was emptied. The inspector noted good housekeeping, radiological and fire protection practices.

4.3 Conclusion

The licensee was continuing their dismantling activities in the reactor, auxiliary and spent fuel buildings in a safe manner.

5 Solid RadWaste Management & Transportation of Radioactive Materials (86750)

5.1 Inspection Scope

The inspector observed the lowering and loading of the fifth spent fuel rack onto a flat bed truck and reviewed an event at the licensee's waste disposal contractor.

5.2 Observations and Findings

On January 29, 2003, the inspector observed the lowering and loading of the fifth spent fuel rack from the top of the turbine building to grade and onto a flat bed truck. This evolution was in preparation for packaging the rack prior to shipment to the waste disposal site. The inspector noted that even though the truck was only going to move a few hundred feet, the licensee took appropriate precautions to assure that the rack was secured to the truck prior to moving it. The rack was covered in at least two layers of plastic and temporarily stored in a covered area protected from the elements. Proper radiological practices and posting was observed. The licensee had shipped 3 of 11 spent fuel racks for disposal and planned on shipping the remaining 8 racks in the next few weeks.

On December 19, 2003, the licensee was informed by their waste disposal site that earlier that day a sling was cut while moving a spent fuel rack from the lower portion of the shipping box causing the rack to fall onto the box. There were no personnel injuries nor environmental releases. This was the second rack shipped to the disposal site. The rack had been boxed and transported to the disposal site without incident and accepted by the disposal site, therefore, there were no transportation violations. The licensee's evaluation of the incident was documented in DQ # 02-0089. Prior to the first shipment of a rack, the licensee had determined that the edges of the racks were sharp and fully capable of slicing through a sling under tension. To mitigate this problem the licensee had welded 2-foot sections of rounded metal to "soften" the edges of the racks. The licensee had also used a spreader bar to keep the slings under the softener. The waste disposal site did not use the spreader bar. The licensee concluded that the sling traveled inward and came off the softener resulting in the sling being sliced. Corrective actions by the licensee included: (1) providing a spreader bar to the waste disposal site; (2) softeners will be welded along the majority of the bottom edge of both sides of all future racks;(3) the shipping box was modified to facilitate sling inspections; (4) the licensee's work group involved in rack removal and packing was briefed on the incident; and (5) the waste disposal site was provided with a revised packaging and removal plan.

5.3 Conclusion

The licensee had shipped 3 of 11 spent fuel racks for disposal and planned on shipping the remaining 8 racks in the next few weeks. At the licensee's contract waste disposal site during the removal of the second spent fuel rack from the shipping box, a lift sling was cut and the rack fell on the shipping box. There were no personnel injuries nor environmental releases.

6 Exit Meeting Summary

The inspector presented the inspection results to members of licensee management and staff at the exit meeting on January 30, 2003. During this inspection, the licensee identified as proprietary the Decommissioning Trust account number which was part of the material reviewed by the inspector. This number does not appear in this report. No other information reviewed by the inspector was identified as proprietary.

ATTACHMENT

PARTIAL LIST OF PERSONS CONTACTED

Sacramento Municipal Utility District

M. Bua, Radiation Protection/Chemistry Superintendent
J. Delezenski, Quality Assurance/Licensing/Administration/Training Superintendent
L. England, Decommissioning/ Nuclear Project Control Coordinator
D. Gardner, Decommissioning Project Manager
R. Jones, Sr. Nuclear Engineer
R. Mannheimer, Sr. Quality Control Engineer
S. Redeker, Manager, Plant Closure and Decommissioning
M. Snyder, Radioactive Waste Superintendent

Contractors

R. Snyder, Sr. Radiological Engineer, Bartlett

INSPECTION PROCEDURES USED

IP 36801	Organization, Management and Cost Controls
IP 37801	Safety Reviews, Design Changes, and Modifications
IP 62801	Maintenance And Surveillance
IP 71801	Decommissioning Performance and Status Review
IP 86750	Solid Radioactive Waste Management And Transportation of Radioactive Materials

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

None

Discussed

None

LIST OF ACRONYMS

AGM	Assistant General Manager
CMRG	Commitment Management Review Group
DQ	Deviation from Quality
ISFSI	Independent Spent Fuel Storage Installation
IP	Inspection Procedure
MSRC	Management Safety Review Committee
ODCM	Offsite Dose Calculation Manual
PDQ	Potential Deviation from Quality
PRC	Plant Review Committee
QA	Quality Assurance
RSAP	Rancho Seco Administrative Procedure
RSQM	Rancho Seco Quality Manual

ATTACHMENT 2

PARTIAL LIST OF DOCUMENTS REVIEWED

Reports

- MPC&D 01-022, dated March 26, 2001, from Manager, Plant Closure and Decommissioning to U. S. Nuclear Regulatory Commission, subject: Rancho Seco Report on Decommissioning Funding Status.
- MPC&D 02-011, dated March 19, 2002, from Manager, Plant Closure and Decommissioning to U. S. Nuclear Regulatory Commission, subject: Rancho Seco Report on Decommissioning Funding Status.
- MPC&D 03-018, dated February 6, 2003, from Manager, Plant Closure and Decommissioning to Assistant General Manager Energy Supply, subject: Rancho Seco Weekly Update: February 2 through February 8, 2003.

Procedures and Data Sheets

- RSAP-0101, Nuclear Organization Responsibilities and Authorities, Revision 28, effective August 28, 2002.
- RSAP-0260, Commitment Management Review Group and Commitment Tracking System, Revision 11, effective September 11, 2002.
- RSAP-0901, Safety Review of Proposed Changes, Test, and Experiments, Revision 21, effective August 26, 2002.
- RSAP-1308, Potential Deviation from Quality, Revision 15, effective September 17, 2002.
- RSQM-Section I, Organization, Revision 11, effective August 26, 2002.
- SP-86, Monthly Auxiliary and Spent Fuel Building Filter System Surveillance, Revision 6, effective April 5, 2000.
    - Data sheet for January 28, 2003.
- SP-841, Weekly Sampling of Ambient Air, Revision 8, effective July 30, 2001.
    - Data sheet for January 08, 2003.
    - Data sheet for January 15, 2003.
    - Data sheet for January 22, 2003.
    - Data sheet for January 28, 2003.
- SP-945, Monthly Radioactive Effluent Sampling Surveillance, Revision 6, effective September 9, 2002.

- Data sheet for January 08, 2003.

- SP-950, Weekly Liquid Holdup Tank 10 Ci Limit Surveillance, Revision 2, effective April 5, 2000

- CSS, Rancho Seco Computerized Surveillance Schedule, by due date. Issued on January 30, 2003.

Potential Deviation from Quality Forms

- DQ # 02-0089, Envirocare Dropped a SFP Rack While Lifting it for Burial Due to Failed Sling, Resulting in Damage to the Shipping Container, originated on December 19, 2002.

CMRG Minutes

- August 26, 2002
- September 4, 2002
- September 18, 2002
- November 20, 2002
- November 26, 2002
- January 8, 2003

10 CFR 50.59/72.48/71.107(c) Screening Evaluations

- Safety evaluation and 10 CFR 50.54(p) analysis for the fuel off-load Physical Security Plan revision (Addition of Appendix C) on August 26, 2002.

- DCP R02-0007, To modify the control system for the Turbine Building Gantry Crane, approved by CMRG on September 18, 2002.

- Proposed changes to the DSAR under amendment 5 Amendment 5, approved by CMRG on November 26, 2002.