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

October 21, 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 50-312/03-003; 72-11/03-002

Dear Mr. Shetler:

An NRC inspection was conducted September 22-25, 2003, at your Rancho Seco Nuclear Generating Station. On September 25, 2003, at the conclusion of the inspection, an exit briefing was conducted with Mr. Steve Redeker, Plant Manager, and other members of your staff. The enclosed report presents the scope and results of that inspection.

This inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection included reviews of the status of general employee training, safety reviews, decommissioning, maintenance and surveillances, physical security program, solid radioactive waste management and transportation of radioactive materials. One previously identified unresolved item related to the primary alarm station was closed as an acceptable item.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violation involved your failure to establish appropriate compensatory measures for the protected area fence. The violation is being treated as a Non-Cited Violation (NCV), consistent with Section VI.A of the Enforcement Policy. The NCV is described in the subject inspection report. If you contest the violation or the significance of the NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with a copies to the Regional Administrator, Region IV, and the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

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; 72-11
License Nos.: DPR-54; SNM-2510

Enclosure:
NRC Inspection Report
050-312/03-003;072-11/03-002

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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket Nos.:	50-312; 72-11
License Nos.:	DPR-54; SNM-2510
Report Nos.:	50-312/03-003; 72-11/03-002
Licensee:	Sacramento Municipal Utility District
Facility:	Rancho Seco Nuclear Generating Station
Location:	14440 Twin Cities Road Herald, California
Dates:	September 22-25, 2003
Inspectors:	Emilio M. Garcia, Health Physicist Gregory A. Pick, Security Inspector
Approved By:	D. Blair Spitzberg, Ph.D., Chief Fuel Cycle and Decommissioning Branch
Attachments:	Supplemental Information Partial List of Documents Reviewed
ADAMS Entry :	IR 05000312-03-003 and 07200011-03-002 on 09/22-25/03; Sacramento Municipal Utility District; Rancho Seco Nuclear Generating Station. Decommissioning Report; No Violations.

EXECUTIVE SUMMARY

Rancho Seco Nuclear Generating Station
NRC Inspection Report 50-312/03-003;72-11/03-002

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

Organization, Management and Cost Controls

- The licensee's training requirements exceed those of 10 CFR 19.12 in terms of the individuals required to be trained and the frequency of training. The training materials include the information required by this regulation (Section 1).

Safety Reviews, Design Changes, and Modifications

- The licensee had a program for conducting safety evaluations as stipulated by 10 CFR 50.59. Safety evaluations appeared to have been performed as required by the licensee's procedures and the regulations (Section 2).

Maintenance and Surveillance

- Reviews indicated that surveillance testing of liquid effluent monitor and calibration of the particulate air samplers for the reactor and auxiliary buildings were being performed as required (Section 3).

Decommissioning Performance and Status Review

- The licensee continued to conduct its dismantling activities in the reactor, auxiliary, spent fuel buildings and other areas of the site in a safe manner (Section 4).

- The licensee reconfigured its restricted area to permit access by construction crews to the Cosumnes Power Plant site. This reconfiguration changed the areas that will be evaluated for residual contamination during license termination (Section 4).

- The licensee continued to maintain an effective fire protection program (Section 4).

Physical Security Assessment

- The licensee determined that it had failed to establish appropriate compensatory measures for the protected area fence. Specifically, for 2 months, the licensee had locked, but not alarmed, a gate as specified by the Physical Security Plan. Since the gate was not alarmed, the licensee should have posted a security officer as a compensatory measure. Upon identification of this deficiency, the licensee immediately posted a security officer as a compensatory measure and initiated long-term corrective

actions. This issue was identified as a Non-Cited Violation of the Physical Security Plan (Section 5).

Solid Radioactive Waste Management And Transportation of Radioactive Materials

- The audit and surveillances of the solid radwaste management and transportation of radioactive materials program was being effectively and objectively implemented by the licensee (Section 6.1).

- The licensee implemented a transportation program for radioactive materials and radioactive waste in accordance with NRC and U.S. Department of Transportation regulations (Section 6.2).

Followup

- An Unresolved Item related to the primary alarm station was closed (Section 7.1).

- During a previous inspection, the NRC inspector observed and commented about the implementation of licensee's air particulate effluent sampling program. A clarification of this observation was provided (Section 7.2).

Report Details

Summary of Facility Status

The Rancho Seco facility was undergoing active decommissioning with dismantlement work in progress in the auxiliary, reactor and spent fuel buildings. Most major components in the auxiliary building have been removed, packaged and shipped for disposal. In the reactor building, most of the major piping, the four reactor coolant pumps, and the core flood tanks have been removed, packaged and disposed. The licensee decided to segment the reactor head for disposal. This task was expected to begin in early November 2003.

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). In the fuel handling building, the spent fuel pool water had been processed and released offsite. The cutting and removal of the pool liner plates was in progress. Concrete cores obtained to evaluate contaminant migration into the spent fuel pool walls remained at the bottom of the pool awaiting collection.

1 Organization, Management and Cost Controls (IP 36801)

1.1 Inspection Scope

The inspectors reviewed the licensee's general employee training program to verify that it was being implemented in accordance with licensee's procedures and NRC requirements. The inspectors observed portions of a general employee training lecture, reviewed written material and interviewed personnel.

1.2 Observations and Findings

Article 6 of the licensee's procedure RP-305, Radiation Protection Plan, states, in part, that "a general radiological indoctrination is given to personnel allowed restricted area access. This includes an explanation of the radiological environment to which they may be exposed (i.e. normal background, types of safety and radiological boundaries used in the restricted area, and response to emergencies)."

This procedure also states that "personnel requiring access into the radiological controlled areas are required to initially pass a written examination and requalify by written examination at least annually. Demonstration of the ability to properly don and remove anti-contamination clothing and use of the step-off-pads will be initially required either by demonstration at Rancho Seco or by prior work experience.

The principal general employee training requirements in NRC regulations are found in 10 CFR 19.12. This regulation specifies the training requirements for all individuals who in the course of employment are likely to receive in a year an occupational dose in excess of 100 millirems (1 milliSievert).

The general employee training consisted of six courses: Category I, General Employee Orientation; Category II, Control Area Radiation Protection; Respiratory Protection and three refresher courses for each of the above areas. Category I courses provided initial training in security, safety, radiation protection, quality assurance and emergency response. Category I training was provided to all individuals requiring unescorted access the industrial area of the site. Category II courses provided training for individuals requiring unescorted access to the radiologically controlled areas. It included radiation fundamentals and protective clothing donning and removal. The respiratory protection training was intended to train personnel in the proper use and care of respiratory protection equipment in a radiologically controlled area.

The licensee had developed a training manual that incorporated a series of training outlines for topical areas in Category I and II training. Each topical area consisted of a series of training objectives. Individuals receiving initial training could borrow copies of the training manual for review prior to taking the class and during the class. The licensee permitted those individuals that were scheduled for retraining to review the training manual and take a written examination to confirm their knowledge of the training objectives.

The inspectors reviewed the training manual, the Category I and II written exams and observed portions of the lectures on a Category II training for new employees. The inspectors noted that the training objectives were the basis of the questions on the written examinations. Not all the objectives were fully covered during the lecture that was observed by the inspectors, but the written material included all the information on the objectives. Students were encouraged to ask questions during the lectures and the instructor answered the questions. In order to successfully pass the training, students must complete a written test with at least 75 percent of the question answered correctly. Individuals who failed the test were offered an opportunity to retake a different test. If they fail a second time they must wait 90 days before retaking the course. Individuals were permitted to audit the course and not take the test.

The inspectors reviewed the attendance records for training provided from July 1, 2002, through September 22, 2003. Table 1 summarizes the training statistics for the period reviewed:

Rancho Seco Training Statistics, July 2002-September 2003

Training	Attempted Test	Passed Test	Per Cent Passed
Initial CAT I	53	49	92.5
Initial CAT II	17	17	100.0
Refresher CAT I	353	351	99.4
Refresher CAT II	242	238	98.3
Totals	**665**	**655**	**98.3**

1.3 Conclusion

The licensee's training requirements exceed those of 10 CFR 19.12 in terms of the individuals required to be trained and the frequency of training. The training materials include the information required by this regulation.

2 Safety Reviews, Design Changes, and Modifications (IP 37801)

2.1 Inspection Scope

The inspectors reviewed selected 10 CFR 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 Group (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.

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 inspectors reviewed the CMRG minutes for the period of February 5 through September 24, 2003. These minutes indicated that during this time nine safety reviews had been approved by the CMRG, seven of which were 10 CFR 50.59 evaluations and the other two were 10 CFR 72.48 evaluations. The inspectors reviewed the three 10 CFR 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 inspectors 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 stipulated 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 (IP 62801)

3.1 Inspection Scope

The inspectors observed the performance of selected maintenance and surveillance activities to verify if structures, systems, and components were being maintained in compliance with offsite dose calculation manual and procedural requirements.

3.2 Observations and Findings

The inspectors interviewed cognizant personnel, reviewed the revised 10 CFR Part 50 technical specifications, the quality manual, and the offsite dose calculation manual (ODCM). With the movement of all spent fuel out of the spent fuel pool and to the ISFSI, all the 10 CFR Part 50 technical specification surveillances had been eliminated. Some surveillances remain in the quality manual and ODCM. The inspectors reviewed records of surveillance testing of the liquid effluent monitor and the calibrations of the particulate air samplers for the reactor and auxiliary buildings.

Surveillance Procedure Manual SP.418A, “Quarterly Test of Liquid Effluent Radiation Monitor (R-15017A),” controls the quarterly surveillance of the liquid effluent monitor. Surveillance Procedure Manual SP.488A, Refueling Interval Calibration of the Liquid Effluent Radiation Monitor (R-15017A), controls the calibration of the liquid effluent radiation monitor. The inspectors reviewed the records of the calibrations and quarterly tests conducted during calendar years 2002 and 2003 as of the time of the inspection. These surveillances had been conducted as required by their associated procedure and had not identified any problems.

Licensee’s procedure “Radiation Detection Instrument Manual RP.311.III.02, Regulated Air Samplers,” describes the calibration of environmental air samplers. This procedure was used for the calibration of air Samplers 2104 and 2105. These two air samplers were used in the reactor and auxiliary buildings discharges, respectively. Records maintained by the licensee indicate that these air samplers were calibrated at least every six months for the period of April 29, 2002, through August 4, 2003.

3.3 Conclusion

Reviews indicated that surveillance testing of the liquid effluent monitor and calibration of the particulate air samplers for the reactor and auxiliary buildings 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 observed work was being conducted in a safe and orderly manner. Radiological controls, including postings and barriers, were in place as needed. The inspectors noted good housekeeping, radiological and fire protection practices in all areas. Major activities observed are noted below.

a. Reconfigured Restricted Area

The licensee had reconfigured the restricted area to permit access by construction crews to the Cosumnes Power Plant site. The fence enclosing the industrial area, which coincides with the restricted area, was relocated. The actual site of Cosumnes Power Plant is outside the Rancho Seco licensed area. This reconfiguration of the restricted area changed the areas that will be evaluated for residual contamination during license termination.

b. Reactor Building

In the reactor building most of the major piping, the four reactor coolant pumps, and the core flood tanks have been removed, packaged and disposed. The licensee had decided to segment the reactor head for disposal. This task was expected to begin in early November 2003. Electrical conduits and floor grates around the steam generators had been removed. Work was proceeding on cutting and removing the concrete decking on the 40-foot elevation, in preparation for removal of major components such as the pressurizer and pressurizer drain tank. The inspectors noted that access to areas where grating had been removed had been covered or a personnel barrier placed to prevent falls.

c. Auxiliary Building

Work was completed on sectioning and removing the B Coolant Waste Receiver Tank. Only one large tank remained in the underground tank farm, the A Coolant Waste Receiver Tank. These tanks were the only remaining major components in the auxiliary building. Structural steel was being removed from the -20 elevation.

d. Fuel Handling Building

The spent fuel pool water had been processed and released offsite. Work was proceeding on cutting and removing the spent fuel pool liner plates. Concrete cores obtained to evaluate contaminant migration into the spent fuel pool walls remained at the bottom of the pool awaiting collection.

e. Outside Tank Farm

The Spent Fuel Cooler pad concrete and asphalt was being removed. The inspectors observed part of the segmentation and removal of the Demineralized Reactor Coolant Storage Tank. Electrical equipment was being removed from the pipe racks.

f. Fire Protection

On May 13, 2002, a small fire occurred in the reactor building during decommissioning activities. Slag from flame cutting fell through a small unrecognized pathway and caused a tarp and bags containing waste material to burn. The fire was quickly identified and put out using a portable fire extinguisher. There was no request for outside assistance and no personnel were contaminated as a result of the fire. The licensee provided additional training to its decommissioning personnel on fire watch procedures. No other fires have occurred in the last 2 years.

The licensee's audit schedule and requirements of the Rancho Seco Quality Manual, Section XVIII, 6.1 requires three different audits of the fire protection program with frequency intervals of 12, 24 and 36 months. The inspectors reviewed Audit Report 02-A-011, Fire Protection Plan, dated December 2, 2002, the last audit completed in this area. This audit was performed by the onsite quality assurance organization and fulfilled the requirements of the Rancho Seco Quality Manual, Section XVIII, 6.1h and j. This audit was conducted between October 14 to November 14, 2002. The inspectors also reviewed Surveillance Report 03-S-001, signed on January 15, 2003.

The inspectors noted that the audit team members were trained and qualified and were independent of the areas audited. The audit and surveillance included performance based elements. The audit concluded that the Fire Protection Plan continued to satisfy the requirements of the license basis documents. No potential deviation from quality reports were issued as a result of the audit. The audit report made one recommendation that was incorporated into the commitment tracking system.

During tours of the facility, the inspectors examined fire extinguishers and found them to be charged and recently serviced. The inspectors observed the presence of fire watches for those activities that carried a fire risk. No undue accumulation of burnable materials or trash were noted.

4.3 Conclusion

The licensee continued to conduct its dismantling activities in the reactor, auxiliary, spent fuel buildings and other areas of the site in a safe manner. The licensee reconfigured the restricted area to permit access by construction crews to the Cosumnes Power Plant site. This reconfiguration changed the areas that will be evaluated for residual contamination during license termination. The licensee continued to maintain an effective fire protection program.

5 Physical Security Assessment (IP 81001)

5.1 Inspection Scope

The inspectors evaluated the physical barriers that protected the ISFSI to ensure they met the requirements specified in the Physical Security Plan.

5.2 Observations and Findings

The inspectors determined the licensee had installed personnel gates in September 2002 at the ISFSI protected area fence. The licensee locked the personnel gates when not in use; however, the licensee did not install alarms on the gates. Because the inner fence is a protected area fence, gates must be locked and alarmed, as specified in the Physical Security Plan.

Physical Security Plan, Section 8.3.1.2.1(2) specified that if any alarm for a gate is out-of-service, security must post an officer as a compensatory measure. During the majority of the time that the ISFSI was in service, security had posted an officer as compensatory measures for other reasons. Once the need for the compensatory measure had been resolved the licensee removed the officer from the post. The licensee failed to recognize the requirement to have an officer posted as a compensatory measure for the locked but not alarmed personnel access gates. The inspectors determined that the licensee had removed the posted compensatory officer in mid-March and that the locked gate had not been compensatory posted for 2 months.

On May 15, 2003, security determined that the personnel gate should have been posted and immediately posted a security officer. The licensee subsequently welded the gate shut so that it had the same characteristics as the fence and secured from the compensatory post.

The inspectors determined that the licensee had maintained the microwave intrusion detection system activated prior to the installation of the personnel gates and that an intruder would need to cross the intrusion detection zone to get to the gates. The licensee initiated potential deviation from Quality 03-023 because they had failed to post compensatory measures in accordance with the Physical Security Plan. The failure to post compensatory measures for the locked but not alarmed personnel access gate into the ISFSI protected area was a violation of the Physical Security Plan, Section 8.3.1.2.1(2). This violation was considered a non-cited violation, consistent with Section VI.A of the NRC Enforcement Policy (072-00011/0302-01). The licensee implemented the following corrective actions: (1) conducted training for security officers, ISFSI technicians, and administrative personnel within the security department; and (2) initiated plans to improve administrative tracking of compensatory measures by September 1, 2003.

5.3 Conclusion

The licensee determined that it had failed to establish appropriate compensatory measures for the protected area fence. Specifically, for 2 months, the licensee had locked, but not alarmed, a gate as specified by the Physical Security Plan. Since the gate was not alarmed, the licensee should have posted a security officer as a compensatory measure. Upon identification of this deficiency, the licensee immediately posted a security officer as a compensatory measure and initiated long-term corrective actions. This issue was identified as a Non-Cited Violation of the Physical Security Plan.

6 Solid Radioactive Waste Management And Transportation of Radioactive Materials (IP 86750)

6.1 Audits and Surveillances

a. Inspection Scope

The inspectors reviewed Audit Report 02-A-010, titled Process Control Program (PCP) + Packaging & Transportation of Radioactive Waste, dated October 22, 2002. The inspectors reviewed the surveillance log and noted that as of the time of the inspection, of the 52 surveillances that had been conducted in 2003, 42 related to radioactive waste processing, transportation, or the disposal sites. The inspectors selected three surveillances for review, Surveillance Reports 03-S-009, approved on May 27, 2003, 03-S-044, approved on July 31, 2003, and 03-S-050, approved on July 15, 2003.

b. Observations and Findings

The inspectors noted that members of the audit teams were independent of the areas audited, trained and qualified, and the audit and surveillances included performance based elements. No quality related problems were identified during these audit and surveillances related to solid radwaste management and transportation of radioactive materials. Recommendations identified in the surveillances were addressed by the audited department.

c. Conclusion

The inspectors concluded that audit and surveillances of the solid radwaste management and transportation of radioactive materials programs were being effectively and objectively performed.

6.2 Shipping of LLRW for Disposal, and Transportation of other Radioactive Material

a. Inspection Scope

The inspectors reviewed shipping records to determine if radioactive waste shipments were in compliance with applicable NRC and U.S. Department of Transportation (DOT) regulations.

b. Observations and Findings

Records maintained by the licensee indicated that as of September 25, there had been 56 shipments of waste made in 2003. The inspectors selected three shipment records for review, 03-003, 03-025, and 03-056. The records indicated that the licensee met the transportation requirements contained in 49 CFR 173.427 for the respective low specific activity (LSA) or surface contaminated object (SCO). The inspectors confirmed that the emergency response telephone number listed on the waste manifests was a telephone number in the secondary alarm station. The licensee's radioactive material shipment check list for each of the shipments reviewed noted that the ISFSI supervisor had been provided with a copy of the DOT shipping paper and the emergency response information. The ISFSI supervisor staffs the site around the clock and his staff would receive the emergency call if one was made. These forms provided sufficient information to satisfactorily meet 49 CFR 172.604 for responding to an emergency. The shipping records included copies of the radiological surveys conducted, Form 540 Uniform Low-Level Radioactive Waste Manifest, emergency response information, instruction to carrier for maintenance of exclusive use shipment controls, and vehicle inspection report. Those documents requiring shipper certification were signed by a licensee authorized and trained shipment manifest preparer.

On September 25, 2003, the inspectors observed final preparations and the dispatch of waste shipment 03-056. This shipment consisted of two packages, a SCO-II package, containing a total of 12.8 millicuries (4.74E+2 Mega-Becquerels), and a LSA-II package, containing 7.5 millicuries (2.77E+2 Mega-Becquerels). The packages were properly blocked and braced, marked and labeled, and the vehicle appropriately placarded. The inspectors observed a radiation protection technician conducting a final survey. The driver was provided with copies of the DOT shipping papers, emergency response information, exclusive use shipment instructions and outgoing radiation and contamination surveys. The inspectors noted that a representative of the quality assurance department was present during the dispatch and reviewed the shipping manifest and associated documents. As noted above, the records indicated that the licensee had met the transportation requirements contained in 49 CFR 173.427 for the LSA and SCO shipments.

c. Conclusion

The licensee implemented a transportation program for radioactive materials and radioactive waste in accordance with NRC and DOT regulations.

7 Followup (92701)

7.1 (Closed) Unresolved Item 072-00011/0301-01: Interior of the primary alarm station visible from the visitor's window

During the previous inspection, the inspectors observed that it was possible for a member of the public to enter the remotely-located building where the ISFSI Primary Alarm Station (PAS) is located and observe the security monitors through the PAS windows. 10 CFR 73.51(d)(3) states, in part, "The Primary Alarm Station must be located within a protected area; ... and the interior of the station must not be visible from outside the protected area." The licensee believes that the requirement applies to the exterior of the building housing the PAS and not the boundary of the alarm station within the facility.

The Region IV office requested technical assistance on this matter from NRC headquarters. On September 11, 2003, the Office of Nuclear Material Safety and Safeguards responded to the Region IV technical assistance request. This response concluded that public access to this alcove where the PAS is located does not compromise security, does not conflict with the regulations or the ISFSI Security Plan, and generally meets the intent of the regulations.

7.2 Clarification

In Section 4.3.b of Inspection Report 50-312/2003-02, the inspectors stated that "the licensee had decided to continue sampling the air particulate effluents even if not required." That statement and others in that report could be misunderstood to infer that the licensee was not required to sample for air particulates. The licensee was no longer required to sample for gaseous releases but was required by the ODCM to sample for air particulates during active decommissioning activities. The licensee decided to implement this requirement by continuous sampling for air particulates.

8 Exit Meeting Summary

On September 25, 2002, at the conclusion of the onsite inspection, the inspectors presented the inspection results to the plant manager and other members of the licensee's staff. The licensee did not identify as proprietary any information provided to, or reviewed by, the inspectors.

ATTACHMENT 1

PARTIAL LIST OF PERSONS CONTACTED

Sacramento Municipal Utility District

M. Bua, Radiation Protection/Chemistry Superintendent
J. Delezenski, Quality Assurance/Licensing/Administration/Training Superintendent
D. Gardner, Decommissioning Project Manager
R. Jones, Licensing Engineer
D. Koontz, ISFSI Supervisor
R. Mannheimer, Sr., Quality Control Engineer
S. Nicolls Radiation Protection/Chemistry/Regulatory/Decommissioning Supervisor
S. Redeker, Manager, Plant Closure and Decommissioning
G. Roberts, Maintenance Superintendent
M. Snyder, Radioactive Waste Superintendent

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 81001	Physical Security Assessment
IP 86750	Solid Radioactive Waste Management & Transportation of Radioactive Materials
IP 92701	Follow-up

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

072-00011/0302-01	NCV	Failure to establish appropriate compensatory measures for the protected area fence.

Closed

072-00011/0301-01	URI	Interior of the primary alarm station may be visible from the exterior.
072-00011/0302-01	NCV	Failure to establish appropriate compensatory measures for the protected area fence.

Discussed

None.

LIST OF ACRONYMS

CMRG	Commitment Management Review Group
DOT	U.S. Department of Transportation
ISFSI	Independent Spent Fuel Storage Installation
IP	Inspection Procedure
LSA	Low Specific Activity
NCV	Non-Cited Violation
ODCM	Offsite Dose Calculation Manual
PAS	Primary Alarm Station
RP	Radiation Protection
SCO	Surface Contaminated Object
URI	Unresolved Item

ATTACHMENT 2

PARTIAL LIST OF DOCUMENTS REVIEWED

Audits and Surveillances

- Audit Report 02-A-010, Process Control Program (PCP) + Packaging & Transportation of Radioactive Waste, dated October 22, 2002.
- Audit Report 02-A-011, Fire Protection Plan, dated December 2, 2002.
- Surveillance Report 03-S-001, Fire Protection Plan, signed on January 15, 2003.
- Surveillance Report 03-S-009, Verify equipment release procedures and security measures are consistent with Rancho Seco contract and Envirocare License and Waste Acceptance criteria, approved on May 27, 2003.
- Surveillance Report 03-S-044, verify that the disposition of Rancho Seco Low Level Radioactive Waste (LLRW) is consistent with the Rancho Seco contract and Envirocare License and Waste Acceptance Criteria, approved on July 31, 2003.
- Surveillance Report 03-S-050, verify that radioactive waste shipments meet DOT and SMUD requirements prior to departure from Rancho Seco. (References: RAD-055, RAD-099, and Vehicle Surveys), approved on July 15, 2003.

Memorandums

- Agenda for CMRG Meeting Held on February 5, 2003, at 8:00 a.m.
- Agenda for CMRG Meeting Held on April 10, 2003, at 10:00 a.m.
- Agenda for CMRG Meeting Held on June 11, 2003, at 8:00 a.m.
- Agenda for CMRG Meeting Held on July 9, 2003, at 8:00 a.m.
- Agenda for Special CMRG as SSRC Meeting Held on July 10, 2003, at 07:20.
- Agenda for CMRG Meeting Held on August 13, 2003, at 8:00 a.m..
- Agenda for CMRG Meeting Held on August 21, 2003, at 10:00 a.m.
- Agenda for CMRG Meeting Held on September 24, 2003, at 8:00 a.m.
- DPT-03-066, Decommissioning Project Status April 2003.
- DPT-03-073, Decommissioning Project Status May 2003.
- DPT-03-084, Decommissioning Project Status June 2003.
- DPT-03-093, Decommissioning Project Status July 2003.

- DPT-03-095, Decommissioning Project Status August 2003.
- Gant Chart, Decommissioning Project Overview Status as of 09-22-03.
- Licensee's News Letter "Watts Happening" September 22, 2003, issue.
- NQA 02-111, December 30, 2002, Memorandum from Jerry Delezenski to Distribution, Subject: 2003 Rancho Seco Audit Schedule.
- NQA 03-007, February 5, 2003, Memorandum from Richard Mannheimer (CMRG Coordinator) to Steve Redeker (Plant Manager), Subject: Minutes for CMRG Meeting held on February 5, 2003.
- NQA 03-025, April 2, 2003, Memorandum from Richard Mannheimer (CMRG Coordinator) to Steve Redeker (Plant Manager), Subject: Minutes for CMRG Meeting held on April 2, 2003.
- NQA 03-049, June 11, 2003, Memorandum from Richard Mannheimer (CMRG Coordinator) to Steve Redeker (Plant Manager), Subject: Minutes for CMRG Meeting held on June 11, 2003.
- NQA 03-056, July 10, 2003, Memorandum from Richard Mannheimer (CMRG Coordinator) to Steve Redeker (Plant Manager), Subject: Minutes for CMRG Meeting held on June 9, 2003.
- NQA 03-057, July 10, 2003, Memorandum from Bob Jones (CMRG Coordinator) to Steve Redeker (Plant Manager), Subject: Minutes for Special CMRG Meeting held on July 10, 2003.
- NQA 03-058, August 13, 2003, Memorandum from Richard Mannheimer (CMRG Coordinator) to Steve Redeker (Plant Manager), Subject: Minutes for CMRG Meeting held on August 13, 2003.
- NQA 03-069, August 21, 2003, Memorandum from Richard Mannheimer (CMRG Coordinator) to Steve Redeker (Plant Manager), Subject: Minutes for CMRG Meeting held on August 25, 2003.
- NQA 03-081, September 24, 2003, Memorandum from Richard Mannheimer (CMRG Coordinator) to Steve Redeker (Plant Manager), Subject: Minutes for CMRG Meeting held on September 24, 2003.
- MPC&D 03-102, Subject: Site Access, From Steve Redeker To: All Personnel with Unescorted (Access) Rancho Seco, dated September 17, 2003.
- Spreedsheet, 2003 SWLLRW Tracking Spreadsheet, generated on September 25, 2003.

10 CFR 50.59 / 72.48 / 71.107(c) Screenings and Evaluations

- Procedure RP 305, Radiation Protection Plan, Revision 9, final review signed July 24, 2003.

- 10 CFR 50.54(q) Emergency Plan Change Evaluation for RP.305.40 (Void), Revision 3, February 5, 2003.

Procedures

- Radiation Control Manual RP 305, Radiation Protection Plan, Revision 9, effective July 24, 2003.

- Radiation Detection Instrument Manual RP.311.III.02, Regulated Air Samplers, Revision 2, effective May 21, 2001.

- Rancho Seco Nuclear Station General Employee Training Examination, CAT I Test, Revision 0, effective May 7, 2003.

- Rancho Seco Nuclear Station General Employee Training Examination, CAT II Test, Revision 0, effective May 7, 2003.

- ST01Z, General Employee Training Program Description, ST 01 Z 0000, Revision 3, effective March 30, 1989. This procedure is no longer effective.

- Surveillance Procedure Manual SP.418A, Quarterly Test of Liquid Effluent Radiation Monitor (R-15017A), Revision 13, effective June 29, 2000.

- Surveillance Procedure Manual SP.418A, Quarterly Test of Liquid Effluent Radiation Monitor (R-15017A), Revision 14, effective May 13, 2003.

- Surveillance Procedure Manual SP.488A, Refueling Interval Calibration of the Liquid Effluent Radiation Monitor (R-15017A), Revision 17, effective February 13, 2001.

General Commitment Status Tracking Reports

- CTS 53249, Follow up to Recommendations for Audit# 01-A-007, Status as of September 25, 2003.

- CTS 53348, A Fire Occurred in the Reactor Building During Decommissioning Work, Status as of December 02, 2002.

Data Sheets

- 2002 Rancho Seco Audit Log.

- 2003 Rancho Seco Audit Log, as of September 25, 2003.

- 2003 PDQ Log, as of September 25, 2003.
- 2003 Surveillance Log, as of September 25, 2003.
- AVS-28A Environmental Air Sampler Calibration Worksheet, for Pump 2104, final review August 6, 2003.
- AVS-28A Environmental Air Sampler Calibration Worksheet, for Pump 2105, final review August 6, 2003.
- Radioactive waste shipment 03-003 documents package.
- Radioactive waste shipment 03-025 documents package.
- Radioactive waste shipment 03-056 documents package.
- Rancho Seco Training Information Management System, Class Attendance Sheet Summary, ST01A0100, GET General Employee Orientation, generated September 23, 2003.
- Rancho Seco Training Information Management System, Class Attendance Sheet Summary, ST01B0100, Controlled Area Radiation Protection, generated September 23, 2003.
- Rancho Seco Training Information Management System, Class Attendance Sheet Summary, ST01G0100, CAT I, generated September 23, 2003.
- Rancho Seco Training Information Management System, Class Attendance Sheet Summary, ST01H0100, CAT II, generated September 23, 2003.
- SP.418A, R-1517A Alarm and Test Data, final review January 13, 2003.
- SP.418A, R-1517A Alarm and Test Data, final review April 9, 2003.
- SP.418A, R-1517A Alarm and Test Data, final review May 13, 2003.
- SP.418A, R-1517A Alarm and Test Data, final review July 1, 2003.
- SP.488A, R-1517A Monitor Calibration, final review May 7, 2002.
- SP.488A, R-1517A Monitor Calibration, final review July 1, 2003.