

November 30, 2004

Mr. Michael J. Meisner, Chief Nuclear Officer
Maine Yankee Atomic Power Company
321 Old Ferry Road
Wiscasset, Maine 04578-4922

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING FINAL
STATUS SURVEY (FSS) SUPPLEMENT NO. 2
Maine Nuclear Safety

On September 15, 2004, Maine Yankee Atomic Power Company (MY) submitted Final Status Survey (FSS) Supplement No. 2, for U.S. Nuclear Regulatory Commission (NRC) review and approval. FSS Supplement No. 2 includes FA-0600 Primary Auxiliary Building (14 survey units).

The staff's review resulted in a number of comments which were discussed with Maine Yankee during an on-site visit conducted on November 16, 2004. The NRC and Maine Yankee staff were able to resolve several comments during the visit, but a number of comments remain unresolved. The attachment provides the unresolved comments requiring resolution before NRC can approve of FSS Supplement No.2. NRC's request for additional information is the result of: (1) missing or insufficient technical information; or (2) missing or insufficient basis for technical conclusions. Maine Yankee is requested to provide the information identified in the attachment. A schedule for Maine Yankee's resubmittal of the additional survey information, and for NRC's subsequent review, will be established during an upcoming biweekly teleconference.

Questions regarding this letter should be directed to John Buckley at 301-415-6607.

Sincerely,

/RA/

Daniel M. Gillen, Deputy Director
Decommissioning Directorate
Division of Waste Management
and Environmental Protection
Office of Nuclear Material Safety
and Safeguards

Docket No.: 50-309
License No.: DPR-36

Attachment: As stated

cc: See next page

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Maine Yankee Request for Additional Information

Supplement 2, Primary Auxiliary Building

1. LTP Section 5.9.2, "Survey Release Record", states that, "The survey unit release record is a stand-alone document containing the information necessary to demonstrate compliance." For the Primary Auxiliary Building Class 1 Areas, 100 % scan survey is required to meet the LTP Section 5.4.1 requirements. From the staff review of the FSS-Release Records and the supportive survey documentation, it is not clear that 100% of the areas described in the Release Packages were surveyed. In general, it is not clear that wrap-around areas, such as door frames, penetrations and other openings, were surveyed since they are not identified on the maps nor their location identified in the survey grids.

Please provide the map locations as well as the grid locations with the supporting survey data that demonstrates that the requirement for the 100% Scan Survey. Please consider the comment as applicable to all Supplement 2 Survey Units.

2. LTP Section 5.9.2, "Survey Release Record", states that, "The survey unit release record is a stand-alone document containing the information necessary to demonstrate compliance." LTP Section 5.5.1 states in part, " that structures will receive scan surveys, direct surveys and when necessary, volumetric sampling with appropriate instruments listed in Table 5-4." Maine Yankee stated in, "Release of Non-ISFSI Site Land - FSS Final Report No. 2," on page 8 of 14 that, "All basement surfaces were remediated to the 30,000 cpm gross gamma activity criterion value to detect and remove contamination at depth..." During the site visit to Maine Yankee during the week of October 25, 2004, the NRC staff reviewed gamma survey records to confirm that all gamma measurements were below 30,000 cpm and found Survey Units 3, 4, 5, 7, 9, 11, and 13 contain no areas above the 300,000 cpm gamma activity. Based on the MY gamma surveys provided to date, the staff identified the areas with the following survey units that exceeded the 30,000 cpm gamma criteria or where no gamma survey measurements have been provided to date.

| Survey Unit / Date | Areas | Gamma Activity (cpm) |
|---|---|--|
| PAB - SU 1 11/19/2003 (Floors are in Unit 10) | C437 is noted for remediation with SU-11 | 35.1K |
| PAB - SU 1 11/13/2003 | C039 C086 C087 | 32K 41K 45K |
| PAB - SU 2 01/06/2004 | C016 C052 C072 C088 C097 C075 | 31.6K 32.3K 36.6K* 36.5K* 35.8K* 36.8K* |
| PAB - SU 2 01/08/2004 | C016 C052 C072, C088, C097 are noted as now being < 30K cpm. Is this due to the shielding? | 31K* 32K* On the survey , it is noted: "2 nd lead added to the ceiling hot spot in the area of C016 &C052 didn't help the lower counts" |
| PAB - SU 2 01/12/2004 | C016 C052 | 28.8K* 29.9K* The Survey notes that Hot Spot in area was shielded. |
| PAB - SU 6 02/12/04 | C152 | Not surveyed, underwater |
| PAB - SU 6 02/13/04 The survey measurements are listed as < DCGL based on samples | C334 C350 C351 C356 C357 | 31.1K 48.2K 30.2K 35.8K 34.1K |
| PAB - SU 8 04/04/04 | Penetrations < 30K | No surveys of junctures |

| Survey Unit / Date | Areas | Gamma Activity (cpm) |
|-----------------------|---|------------------------|
| PAB SU 10 01/16/04 | C029 C064 C213 | 57K 56.9K 30.4 K |
| PAB - SU 12 | Gamma survey notes that survey was on bedrock and measurements were isotopically determined to be < DCGLs | need data |
| PAB - SU 14 | No surveys provided | Need Surveys |

Please provide documentation that demonstrates compliance with the 30K cpm gamma criteria for Survey Units 1, 2, 6, 8, 10, 12 and 14. In addition, for Survey Unit 2, please clarify the placement of the shielding and the relationship to the measurements.

3. LTP Section 5.4.1, "Scan Survey Coverage" states, "A 100% accessible area scan of Class 1 survey units will be required." In addition, Table 5-3 "Scan Measurements" shows that the Scan Coverage for Class 1 is 100%. Survey Units 5 and 12 have areas where FSS scan surveys were not performed, and therefore do not meet the 100% Scan Coverage requirement. In both survey units, Maine Yankee concludes that the areas meet the release criteria based on site historical information. However, no survey data is provided to document that these areas have been surveyed to demonstrate compliance with the release criteria. In the two Release Records for Survey Units 5 and 12, it is stated that Maine Yankee issued Condition Report (CR) 04-126 to document the missing survey information. As of November 17, 2004, the CR corrective actions have not been finalized nor the actions completed or the CR closed.
 - Survey Unit 5, a 0.5 m² area at a wall-floor interface (juncture) was not surveyed.
 - Survey Unit 12, 1.5 linear meters of trench were not surveyed.

Please provide surveys that demonstrate that these locations meet the Maine Yankee conclusion that these areas meet the release criteria as well as the completed CR-04-126 and the supporting documentation.

4. Survey Unit 14 Table 2-2, uses terminology such as, "Gross Activity Equivalent" and "Design Background," that was agreed in July 2004 to be revised to terms consistent with health physics practices. In addition, the histogram on page 27 does not show the negative data values.
5. In Attachment 1 to Supplement 2, page 7 Of 14, Section 4.3., it is stated that, "Provision is also made to ensure State and NRC authorities are allowed adequate time for survey measurements, if necessary, prior to the basement being filled." The staff would like to clarify that this assertion was not supported by the Maine Yankee project schedule in that the NRC was only able to perform In-Process Surveys instead of Confirmatory Surveys as planned in advance with Maine Yankee Management, the NRC and the NRC's independent contractor, ORISE.