

# Maine Yankee

321 OLD FERRY RD. • WISCASSET, ME 04578-4922

May 5, 2005

MN-05-019

RA-05-022

Proposed Change No. 218, Supplement 20

UNITED STATES NUCLEAR REGULATORY COMMISSION

Attention: Document Control Desk

Washington, DC 20555

- References:
- (1) License No. DPR-36 (Docket No. 50-309)
  - (2) Maine Yankee Letter to USNRC, MN-04-020, dated March 15, 2004, License Amendment Request: Release of Non-ISFSI Site Land, Proposed Change No. 218
  - (3) Maine Yankee Letter to USNRC, MN-04-60, dated December 22, 2004, Release of Non-ISFSI Site Land - FSS Final Report No. 6
  - (4) USNRC Letter to Maine Yankee, dated April 7, 2005 Request for Additional Information (RAI) Regarding Final Status Survey (FSS) Supplement No. 6.

**Subject: Response to NRC RAI on FSS Final Report No. 6**

On March 15, 2004, Maine Yankee submitted a request for amendment (Reference No. 2) to the facility operating license (Reference No. 1) pursuant to 10 CFR 50.90 and in accordance with the NRC Approved License Termination Plan (LTP) for Maine Yankee, to indicate NRC's approval of the release of the Non-ISFSI site land from the jurisdiction of the license. In support of that request, Maine Yankee supplied the information required in LTP section 1.4.2 and 5.9.3. The land area associated with the license amendment request included the entire non-ISFSI portion of the site land. The dismantlement and survey information for the survey units is being submitted to the NRC in FSS Final Reports.

In Reference No. 3, Maine Yankee submitted FSS Final Report No. 6. In Reference No. 4, USNRC requested additional information on technical information submitted in FSS Final Report No 6. This additional information is provided in an attachment to this letter.

If you have any questions, please contact me.

Sincerely,



Michael J. Meisner

Michael J. Meisner  
Vice President & Chief Nuclear Officer

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UNITED STATES NUCLEAR REGULATORY COMMISSION

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Page 2 of 2

Attachment: Maine Yankee Response to NRC Request for Additional Information (RAI)  
Regarding Final Status Survey (FSS) Final Report No. 6

cc: Dr. R. R. Bellamy, NRC Region I  
Mr. D. R. Lewis, Esq., Shaw Pittman  
Mr. C. Pray, State of Maine, Nuclear Safety Advisor  
Mr. P. J. Dostie, State of Maine, Division of Health Engineering  
Mr. D. Gillen, NRC Acting Director, Division of Waste Management  
Mr. M. Rosenstein, USEPA Region I  
Mr. S. J. Collins, NRC Regional Administrator, Region I  
Mr. J. Buckley, NRC NMSS Project Manager, Decommissioning  
Mr. M. Roberts, NRC Region I  
Mr. R. Shadis, Friends of the Coast

**Maine Yankee Response to NRC Request for Additional Information (RAI) Regarding  
Final Status Survey (FSS) Final Report No. 6**

**NRC RAI No. I - Generic ISOCS Comments**

*During the NRC staff review of Supplement 6, the staff reviewed Maine Yankee Engineering Calculation, "Use of Canberra In Situ Object Counting System (ISOCS) for FSS Surveys," EC-003-04, Rev. 1, dated November 18, 2004. Engineering Calculation EC-003-04, Rev. 1, is identified as the technical basis document (TBD) for FSS of soil remediation areas. Engineering Calculation EC-003-04, Rev. 1, is based on the NRC reviewed and approved Technical Basis Document - Forebay FSS Survey Measurement Methods (In situ Gamma Spectroscopy), dated September 3, 2003.*

*The staff is unable to verify that Maine Yankee submitted EC-003-04, Rev. 1, for NRC review 30-days prior to use as required by LTP Section 5.5.1. As such, the staff was unable to comment on the use of the ISOCS for soil surveys, specifically scan surveys, following remediation. The staff agrees that the ISOCS system may be a preferred method for performing FSS. However, there are fundamental technical differences in the use of the ISOCS for soil surveys versus the Forebay that must be addressed in either an Engineering Calculation or the FSS report. The staff has the following comments concerning EC-003-04, Rev. 1, and the soil surveys as submitted in Supplement 6.*

**NRC RAI No. I.1 - General Comment**

*EC-003-04, Rev. 1, relies heavily on the NRC reviewed and approved TBD for Forebay ISOCS measurements. EC-003-04, Rev. 1, did not draw comparisons and distinctions between the measurements in the two areas. Maine Yankee needs to add discussion to EC-003-04, Rev. 1, to clarify changes made to the Forebay ISOCS measurement approach.*

**Maine Yankee Response:**

As was discussed in EC 003-04 pg. 12, in situ gamma spectroscopy is capable of detecting soil activity at a fraction of the DCGL (~0.3 pCi/g or less). The standard geometry for soil is the circular plane. This was the geometry described in the Forebay Technical Basis Document with appropriate adjustment made for materials, depths and densities of soil. The source-to-detector distance can be accurately specified for soil measurements as opposed to underwater surveys. Detector distances used for FSS have typically been 4 m, 3 m or 2m. Following discussions with the State of Maine, a decision was made to limit FSS ISOCS measurements, using the standard circular plane geometry for surface soil, to a distance of 3 m or less. This distance ensures a consistent scan MDC approach with the SPA-3 detector of being able to detect activity at the DCGL<sub>EMC</sub> level in a 1 m<sup>2</sup> area located at the periphery of the field of view. The evaluation of the scan MDC for ISOCS is presented in Table 3 of EC 003-04. Attached Appendix A includes a full copy of EC-003-04 which includes the additional geometries for the use of the ISOCS for soil survey.

**Maine Yankee Response to NRC Request for Additional Information (RAI) Regarding  
Final Status Survey (FSS) Final Report No. 6**

**NRC RAI No. I.2 - EC-003-04, Rev. 1, Page 3 of 15**

*The bottom paragraph need clarification, but does not impact the measurements. ISOCS models the measurement environment and resulting detector response function using point-kernel methods, not the Monte Carlo N Particle Transport Code (MCNP). EC-003-04, Rev. 1 should be corrected.*

**Maine Yankee Response:**

A pen and ink change was made to EC 003-04 as suggested. See Appendix A, attached.

**NRC RAI No. I.3 - EC-003-04, Rev. 1, Page 4 of 15, Application of In Situ Gamma Survey Techniques to Forebay Surveys**

*This paragraph begins to address the issue of how one sets the measurement height, z, the size/type of collimator, and the overall measurement geometry. All of these parameters, including adjustments for background, affect measurement sensitivity. As a result, if the objective of the document is to prove that the measurement method meets sensitivity requirements, relative to the  $DCGL_W$  and/or the  $DCGL_{EMC}$ , then these parameters need to be explicitly listed. In EC-003-04, Rev. 1, it is stated, "The source-to-detector distance is typically 20-50cm, however, the distance used is adjusted based on sample K-40 activity which has been found to be the best indication of proper source-to-detector distance." The use of K-40 activity was employed for the Forebay surveys, but the application to soil surveys is unclear. The fundamental geometric configuration, for example detector height, in conjunction with the count time, must be specifically stated in EC-003-04. If these values are to be measurement specific, EC-003-04, should reference procedures for determining the parameters and include the resultant values in the FSS release records. The staff believes that the source to detector distances must be clearly established in either EC-003-04, or the FSS release records.*

**Maine Yankee Response:**

The detector height and MDC values are established in the FSS survey instructions as shown in the attached (Appendix C) examples for FR0111 SU-15 and FR0100 SU-3 using the circular plane geometry with the standard FSS design process. If geometries other than the standard circular plane are needed to more accurately model the field conditions of the survey unit, such as a deep hole, a U-shaped trench which formerly held a pipe, or other unique feature, a new geometry is developed, reviewed and approved by qualified radiological engineers and placed in the "ISOCS Geometries" notebook. The approved geometries contain the detector distance, depths of absorbers, and material densities.

The technicians in the field use the "count to MDA" feature of the ISOCS software in order to ensure that count times are sufficient to achieve the MDC values established on Form 9 of the survey design package. The investigation criteria are typically set at 0.36 pCi/g for Co-60 and

**Maine Yankee Response to NRC Request for Additional Information (RAI) Regarding  
Final Status Survey (FSS) Final Report No. 6**

1.0 pCi/g for Cs-137 with the MDC set at or below the investigation criteria. A comparison of K-40 activity is not needed to verify distances because the distances can be directly measured in the field. However, the reported K-40 activity can be used to check whether the geometry is conservatively evaluating radioactivity in the soil when compared to a volumetric sample value.

**NRC RAI No. I.4 - EC-003-04, Rev. 1, Page 12 of 15, Summary of Experience with Other FSS Surveys**

*This section addresses the question related to edge effects and the fact that the effective areal efficiency of the detector decreases as  $r$  increases from 0 out to  $r$  (field of view). The results table shows that the MDCs are less than the  $DCGL_{EMC}$  of 10.9 and 28.4 pCi/g, for Co-60 and Cs-137, respectively. However, EC-003-04, Rev. 1 does not contain ISOCS input data sets or provide assumptions for the analysis. The derivation of the MDCs for comparison to the  $DCGL_{EMC}$  cannot be independently validated because essential technical details were not included in EC-003-04, Rev. 1. Please provide the ISOCS input data sets and assumptions for the analysis.*

**Maine Yankee Response:**

The ISOCS reports referenced in EC 003-04 have been included in the copy of the document provided. The data were generated using spectra with positively-detected Co-60 and Cs-137 in soil and normalizing the results to 0.36 pCi/g Co-60 and 1.0 pCi/g Cs-137. The results show that the 1 m<sup>2</sup> activity located at the edge of the field of view would be less than the  $DCGL_{EMC}$ .

**NRC RAI No. I.5 - EC-003-04, Rev. 1, Page 12 of 15**

*EC-003-04, Rev. 1, discusses 2 soil geometries (3m and 1m edge effect), however in FR-0111-SU1, Section B states that, "scans covering 100% of the 212.6 m<sup>2</sup> area were accomplished by the use of an in situ gamma spectroscopy detector configured at a 4-meter distance from the surface to obtain overlapping 50-m<sup>2</sup> fields of view." FR-0111-SU2 refers in Table 2-2 to a "Well" geometry. In FR-0111-SU3, the ISOCS was used at four distances including 2m, 3m, 9ft and 9in, and in SU7 a "hole" geometry is referenced. In FR-0111 SU4 and SU5, a "U-Channel" geometry is noted as been applied. Please provide a technical justification for all ISOCS geometries utilized in the Maine Yankee FSS release records.*

**Maine Yankee Response:**

As stated above, geometries for unique situations are developed, reviewed and approved by qualified radiological engineers and placed in the "ISOCS Geometries" notebook. Copies of the approved geometries are attached to this response in Appendices A and B.

**Maine Yankee Response to NRC Request for Additional Information (RAI) Regarding  
Final Status Survey (FSS) Final Report No. 6**

**NRC RAI No. I.6 - EC-003-04, Rev. 1, page 12 of 15**

*EC-003-04, Rev. 1, discusses the 1m edge effect with the detector at a height of 3m and a field of view of 28 m<sup>2</sup>. The staff questions whether the ISOCS is able to adequately detect hot spots on the fringe or marginal areas of the scan areas. EC-003-04, Rev. 1, does not appear to have fully addressed the marginal edge scan areas.*

- *In FR-0111-SU1, the ISOCS is used at a 4m distance and a field of view of 50m<sup>2</sup> area. The staff is concerned that the ability of the system to detect elevated activity in the outer 1m<sup>2</sup> area has not been adequately justified.*
- *In FR-0111-SU2, the ISOCS was used at a 2m height (8m diameter hole geometry) and a 100 m<sup>2</sup> field of view.*

**Maine Yankee Response:**

Early soil scans (FR-0111-SU 1 & 2) were performed in order to maximize the area covered by a single measurement. The distance was later reduced to 3 m or less in order to ensure an MDC at the  $DCGL_{EMC}$  for a 1 m<sup>2</sup> area at the edge of the field of view of 28m<sup>2</sup> as described in EC-003-04, Rev 1.

Both of these survey units, were sampled at a sample density that produced relatively small areas between the sample points (10.6 m<sup>2</sup> and 6.4 m<sup>2</sup>). For FR-0111-SU1, the 4m detector distance resulted in an ISOCS MDC that was less than the  $DCGL_{EMC}$  for the design sample area (area between the sample points) at the edge of the field of view. For both survey units, the sample mean was a fraction of the DCGL. For FR-0111-SU2, all of the sample results were less than MDA. These factors provide confidence that the survey units met the release criteria. Nonetheless, FR-0111-SU1 was re-surveyed under FR-0111-SU9. FR-0111-SU2 was re-surveyed under FR-0111-SU16. Both FR-0111-SU9 and SU16 were surveyed using a source to detector distance of 3m.

**NRC RAI No. I.6 - FR-0111 SUs 1-5**

*Table 2-2, lists ISOCS scan MDCs in ranges from 0.09 to 0.9 pCi/g. Please provide a technical justification for the MDCs for both Cs-137 and Co-60 in EC-003-04, Rev. 1, and the specific MDCs used in each survey unit.*

**Maine Yankee Response:**

The Table 2-2 values in the Release Records reflect the range of MDCs and include both Co-60 and Cs-137 results. The MDC values applied to FR0111 for Co-60 were between 0.09 and 0.26 pCi/g while the Cs-137 MDCs were 0.10 to 0.90 pCi/g as shown in the Table below. The MDC was less than or equal to the soil investigation criterion except for special geometries such as pipe or trench. As stated previously, the MDC is provided in the survey instruction. Future Table 2-2 information will clearly show which MDCs are for Cs-137 and which are for Co-60.

**Maine Yankee Response to NRC Request for Additional Information (RAI) Regarding  
Final Status Survey (FSS) Final Report No. 6**

FR0111 SU-1 Through SU-5 Scan MDCs						
SU #	Scan MDC pCi/g		Investigation Criteria pCi/g		DCGLemc pCi/g	
	Co-60	Cs-137	Co-60	Cs-137	Co-60	Cs-137
1	0.2	0.5	0.36	0.5	2.15	5.98
2	0.1	0.2	0.36	0.5	2.67	7.40
3	0.1-0.26	0.14-0.39	0.36	1.0	1.29	3.58
4	0.1-0.21	0.17-0.33	0.36	1.0	1.53	4.25
5	0.1-0.21	0.15-0.40	0.36	1.0	1.52	4.23

**NRC RAI No. II.1 - FA-2600-SU1 LSA Test Pit**

*Page 2 of 25, Section B states, "In addition, there were four junctures scanned as shown on Map FA-2600-01g." LTP Section 5.5.1 (a & d) establish methods for determining contamination at depth for wall interfaces (junctures), cracks and crevices. Please provide information, juncture sample results or gamma surveys, that demonstrates the contamination at depth and the level of residual radioactivity in the junctures to ensure no under foundation contamination.*

**Maine Yankee Response:**

The gamma survey results which demonstrate the juncture activity for FA2600 are attached (Appendix D). These gamma results cover the surfaces adjoining the junctures shown on Map FA-2600-01g. The volumetric sample showed Co-60 present at 0.317 pCi/g and Cs-137 at 0.879 pCi/g. The combined activity of 1.196 pCi/g was well below the 37 pCi/g activity that is equivalent to 18,000 dpm/100 cm<sup>2</sup> surface activity deposited in 1 cm of material. Juncture beta scans were listed as grids C057, C058, C059, and C060. The beta scan results were 1150 gross c/m, 1480 gross c/m, 693 gross c/m, and 732 gross c/m respectively which were all less than the 3495 c/m investigation criteria. The gamma scans for these junctures were covered by the gamma scans of the adjoining grids.

Note: Appendix D shows some grids with initial remediation survey gamma scan results above 30 kcpm. These grids were either remediated to less than 30 kcpm (eg. scan grid nos. C052, C053, C054, and C055) or were completely removed (eg. scan grid nos C001, C002 and C039 - these are the tops of walls that were demolished.)

**NRC RAI No. II.2 - FB-1700-SU1 Staff Building Basement**

*Section D describes the investigation of an alarm in Grid 179 and concluded that the volumetric sample results verified the absence of plant related activity. Please provide the sample results including the nuclides identified in the gamma spectroscopy.*

**Maine Yankee Response:**

The result of the volumetric sample from grid 179 was no detectable plant-derived activity at an MDA of 0.12 pCi/g and 0.11 pCi/g for Co-60 and Cs-137 respectively.

**Maine Yankee Response to NRC Request for Additional Information (RAI) Regarding  
Final Status Survey (FSS) Final Report No. 6**

**NRC RAI No. II.3 - FR-0111-SU3 Yard Area West Excavations**

*Attachment 1, Page 12 of 22, states, "Elevated H-3 concentrations were detected in excavations in FR-0111 Survey Unit 3." The tritium results were not quantified. Please provide the tritium results.*

**Maine Yankee Response:**

The tritium sample results collected from the yard excavations are attached (Appendix E). Also attached (Appendix E) is a map showing data location with the nomenclature in use at the time. The tritium levels were monitored and observed to decrease to acceptable levels less than the LTP groundwater DCGL of 6,812 pCi/L.

**NRC RAI No. III - FR-0400 Forebay FSS-RRs - Item No. 1**

*In SU-7 and SU-8, the Scan MDCs in Table 2-2 are < 70 pCi/g for Co-60 and < 35 pCi/g for Co-60 respectively. In both survey units, the scan MDC exceeds the DCGL<sub>EMC</sub> of 16.8 pCi/g for Co-60. Given that the reported scan MDC exceeds the DCGL<sub>EMC</sub>, the survey design and implementation appears inadequate and both survey units should have failed. Please clarify.*

*In addition, Note 1 to Table 2-2 states that, "the effective activity for non-detect Co-60 is 25% of the reported MDC as discussed in Section E." Please justify the 25% adjustment.*

**Maine Yankee Response:**

The DCGL<sub>EMC</sub> listed in Table 2-2 is the design DCGL<sub>EMC</sub> value which assumes an area factor of 1.4 for the 77 m<sup>2</sup> area between direct measurement points. The actual areas of the elevated measurements were 8 and 4 m<sup>2</sup> which result in area factors of 2.8 and 4.1 with DCGL<sub>EMC</sub> values of 49.2 and 33.6 pCi/g. The 25% is the factor of 4 used to adjust the reported activity and DCGL values to account for the reduced depth of the contaminated soil band behind the dike rip-rap (6" versus 24"). Thus the corrected MDC is comparable to the DCGL<sub>EMC</sub>.

As identified in the release records for SU-7 and SU-8 "The Maine Yankee License Termination Plan (LTP) states that the Forebay dose from residual radioactivity is so insignificant and the probability so low that an individual would be able to successfully place a viable well within the Forebay, survey measurement of the Forebay surfaces including rip-rap will be limited." Thus, the scan MDC exceeding the *a priori* DCGL<sub>EMC</sub> should be understood to be part of this "limited" survey. Therefore, the FSS of the Forebay is consistent with the Maine Yankee License Termination Plan.



**Maine Yankee Response to NRC Request for Additional Information (RAI) Regarding  
Final Status Survey (FSS) Final Report No. 6**

**NRC RAI No. III - FR-0400 Forebay FSS-RRs - Item No. 2**

*In SU-7 and SU-8, Table 2 provides two types of FSS data, in situ and soils samples. The two methods may vary considerably in the precision and accuracy in the Data Quality Assessment. It is not clear that the Data Quality Objectives evaluated to determine the impact. Please clarify.*

**Maine Yankee Response:**

The Table 2 results for survey units 7 and 8 of the forebay reflect the reported uncertainties for both ISOCS underwater measurements and volumetric sample results. DQOs for uncertainty were not specified for the ISOCS measurements because such data are highly dependent on the actual field geometries. However, the range of values for Co-60 was 1.81E-2 to 2.45E0 pCi/g with the largest value reported for the volumetric sample result and the highest in situ uncertainty was 1.91E0 pCi/g which is similar. The uncertainties were evaluated by adding two standard deviations to the reported activities. The result was an increase in the mean Cs-137 and Co-60 activities of 20% which is still less than the DCGL. The uncertainties for the volumetric samples were compared to the ISOCS uncertainties. The volumetric samples showed an increase of 9% when 2 sigma was added to the reported activities. The ISOCS measurements showed a 47% increase with the mean value equal to the mean value of the unaltered volumetric data. (This may be the result of the slight under response of the underwater measurements.) The 2 sigma ISOCS mean value was also less than the DCGL. The results for SU-7 and SU-8 appear reasonable for the "limited" scope of the survey performed in the forebay.

**References**

1. Maine Yankee Letter to USNRC, MN-02-048, dated October 15, 2002, Revision 3, Maine Yankee's License Termination Plan
2. USNRC Letter to Maine Yankee dated February 28, 2003, "Issuance of Amendment No. 168 to Facility Operating License No. DPR-36 - Maine Yankee Atomic Power Station - Approval of the MY License Termination Plan
3. Maine Yankee Letter to USNRC, MN-04-020, dated March 15, 2004, License Amendment Request: Release of Non-ISFSI Site Land, Proposed Change No. 218
4. USNRC Memorandum from John T. Buckley to Claudia M. Craig dated March 23, 2004, Meeting Report for the March 17, 2004, Meeting with Maine Yankee Atomic Power Company (Maine Yankee)
5. USNRC Memorandum from John Buckley to Biweekly Notice Coordinator dated May 5, 2004, Request for Publication in Biweekly FR Notice - Notice of Consideration of Issuance of Amendment to Facility Operating License DPR-26, Proposed No Significant Hazards Consideration Determination, and Opportunity for Hearing (TAC No. L52090)
6. Maine Yankee Letter to USNRC, MN-04-031, dated May 6, 2004, Release of Non-ISFSI Site Land - FSS Final Report No. 1A, Proposed Change No. 218, Supplement 1
7. Federal Register Biweekly Notice: Applications and Amendments to Facility Operating Licenses Involving No Significant Hazards Consideration - Maine Yankee, 69FR29768, dated May 11, 2004

**Maine Yankee Response to NRC Request for Additional Information (RAI) Regarding  
Final Status Survey (FSS) Final Report No. 6**

8. Maine Yankee Letter to USNRC, MN-04-042, dated July 6, 2004, Maine Yankee License Amendment Request - Release of Non-ISFSI Site Lands
9. USNRC Letter to State of Maine dated July 30, 2004, Response to State of Maine Comments on Maine Yankee License Amendment Request - Release of Non-ISFSI Site Lands
10. Maine Yankee Letter to USNRC, MN-04-044, dated August 12, 2004, Release of Non-ISFSI Site Land - Resubmittal of FSS Final Report No. 1, Proposed Change No. 218, Supplement 2
11. USNRC Letter to Maine Yankee dated August 18, 2004, Integrated Inspection No. 05000309/2004001
12. USNRC Letter to Maine Yankee dated August 18, 2004, Changes to the Maine Yankee Atomic Power Station License Termination Plan Using the 50.59 Process
13. Maine Yankee Letter to USNRC, MN-04-047, dated September 2, 2004, License Amendment Request - Release of Non-ISFSI Site Land, Proposed Change No. 218, Supplement 3
14. Maine Yankee Letter to USNRC, MN-04-048, dated September 7, 2004, Reply to NRC Letters Re: Changes to Maine Yankee LTP Using 50.59 Process
15. USNRC Letter to Maine Yankee dated October 14, 2004, Meeting Report for the September 9, 2004, Meeting with Maine Yankee Atomic Power Company (Maine Yankee)
16. Maine Yankee Letter to USNRC, MN-04-049, dated September 15, 2004, Release of Non-ISFSI Site Land - FSS Final Report No. 2, Proposed Change No. 218, Supplement 4
17. USNRC Letter to Maine Yankee dated September 24, 2004, Request for Additional Information Regarding Final Status Survey (FSS) Final Report No. 1A.
18. Maine Yankee Letter to USNRC, MN-04-052, dated October 12, 2004, Release of Non-ISFSI Site Land - FSS Final Report No. 3, Proposed Change No. 218, Supplement 5
19. Maine Yankee Letter to USNRC, MN-04-053, dated October 14, 2004, Release of Non-ISFSI Site Land - Addendum to FSS Final Report No. 1, Proposed Change No. 218, Supplement 6
20. USNRC Letter to Maine Yankee dated November 4, 2004, Request for Additional Information (RAI) Regarding Final Status Survey (FSS) Supplement Nos. 1 and 3
21. Maine Yankee Letter to USNRC, MN-04-056, dated November 17, 2004, Release of Non-ISFSI Site Land - FSS Final Report No. 4, Proposed Change No. 218, Supplement 7
22. USNRC Letter to Maine Yankee dated November 17, 2004, Maine Yankee - NRC Inspection Report NO. 05000309/2004001 and NRC Office of Investigations Report No. 1-2004-001
23. USNRC Letter to Maine Yankee dated November 22, 2004, Correction to NRC Letter to Maine Yankee, dated November 17, 2004.
24. USNRC Letter to Maine Yankee dated November 30, 2004, Request for Additional Information (RAI) Regarding Final Status Survey (FSS) Supplement No. 2
25. USNRC Letter to Maine Yankee dated November 30, 2004, Receipt of Final Status Survey (FSS) Supplement No. 4.
26. Maine Yankee Letter to USNRC, MN-04-058, dated December 7, 2004, Response to NRC RAI's on FSS Report Nos. 1 and 3, Proposed Change No. 218, Supplement 8

**Maine Yankee Response to NRC Request for Additional Information (RAI) Regarding  
Final Status Survey (FSS) Final Report No. 6**

27. Maine Yankee Letter to USNRC, MN-04-059, dated December 7, 2004, Release of Non-ISFSI Site Land - FSS Final Report No. 5, Proposed Change No. 218, Supplement 9
28. Maine Yankee Letter to USNRC, MN-04-060, dated December 22, 2004, Release of Non-ISFSI Site Land - FSS Final Report No. 6, Proposed Change No 218, Supplement 10
29. Maine Yankee Letter to USNRC, MN-04-061, dated December 23, 2004, Response to NRC RAI's on FSS Report No. 2, Proposed Change No. 218, Supplement 11
30. USNRC Letter to Maine Yankee dated December 29, 2004, Receipt of Maine Yankee Final Status Survey Report Supplements 5 and 6
31. USNRC Letter to Maine Yankee dated January 5, 2005, Request for Additional Information (RAI) Regarding Final Status Survey (FSS) Supplement No. 4
32. USNRC Letter to Maine Yankee dated January 7, 2005, Receipt of Maine Yankee's Response to Request for Information on Final Status Survey Report Supplements 1 and 3
33. USNRC Letter to Maine Yankee dated January 19, 2005, Request for Additional Information (RAI) Regarding Final Status Survey (FSS) Supplement No. 2
34. Maine Yankee Letter to USNRC, MN-05-001, dated January 20, 2005, Release of Non-ISFSI Site Land - FSS Final Report No. 7, Proposed Change No. 218, Supplement 12
35. Maine Yankee Letter to USNRC, MN-05-002, dated January 26, 2005, Technical Basis Document for NRC Review: Exploranium GR-130 Minimum Detectable Concentration (MDC) of Cs-137 and Co-60 in Surface Soil - 30 Day Notice per LTP Requirement
36. Maine Yankee Letter to the NRC, MN-05-003, dated January 26, 2005, Area Classification Change: Storm Drains (D3500) - Section 7
37. Maine Yankee Letter to USNRC, MN-05-004, dated January 27, 2005, Response to NRC RAI on FSS Report No. 4, Proposed Change No. 218, Supplement 13
38. USNRC Letter to Maine Yankee dated January 27, 2005, Receipt of Maine Yankee Final Report Supplement 7
39. USNRC Letter to Maine Yankee dated February 9, 2005, Response to Area Classification Change: Storm Drains (D3500)
40. Maine Yankee Letter to USNRC, MN-05-006, dated February 16, 2005, Response to NRC RAI's on FSS Final Report Nos. 1 and 2, Proposed Change No. 218, Supplement 14
41. Maine Yankee Letter to USNRC, MN-05-007, dated February 17, 2005, Release of Non-ISFSI Site Land - FSS Final Report No. 8, Proposed Change No. 218, Supplement 15
42. Maine Yankee Letter to USNRC, MN-05-008, dated February 23, 2005, Release of Non-ISFSI Land - FSS Final Report No. 8 - Attachment I, Figure 1 and 2 and Attachment II Header Page, Proposed Change No. 218, Supplement 16
43. Maine Yankee Letter to USNRC, MN-05-009, dated February 23, 2005, Response to NRC Comments on Maine Yankee Area Classification Change: Storm Drains (D3500) - Section 7
44. USNRC Letter to Maine Yankee dated February 23, 2005, Receipt of Maine Yankee Responses to Requests for Additional Information Regarding Supplements 1 and 2 and Final Status Survey Report Supplement 8
45. USNRC Letter to Maine Yankee dated February 24, 2005, Acceptance of Maine Yankee Technical Basis Document for the Limited Use of the Exploranium GR-130 Instrument

**Maine Yankee Response to NRC Request for Additional Information (RAI) Regarding  
Final Status Survey (FSS) Final Report No. 6**

46. USNRC Letter to Maine Yankee dated March 2, 2005 <sup>1</sup>, Approval of Final Status Survey Supplement No. 4
47. USNRC Letter to Maine Yankee dated March 13, 2005, Request for Additional Information (RAI) Regarding Final Status Survey (FSS) Supplement No. 5
48. USNRC Letter to Maine Yankee dated March 21, 2005, Storm Drain Area Survey Unit Classification Change
49. USNRC Letter to Maine Yankee dated March 28, 2005, Review of Maine Yankee Response to NRC RAI's on FSS Report Nos. 1 and 2
50. Maine Yankee Letter to USNRC, MN-05-015, dated April 7, 2005, Response to NRC RAI on FSS Final Report No. 5, Proposed Change No. 218, Supplement 17
51. Maine Yankee Letter to USNRC, MN-05-016, dated April 7, 2005, Release of Non-ISFSI Site Land - FSS Final Report No. 9, Proposed Change No. 218, Supplement 18
52. USNRC Letter to Maine Yankee dated April 7, 2005, Request for Additional Information (RAI) Regarding Final Status Survey (FSS) Supplement No. 6
53. Maine Yankee Letter to USNRC, MN-05-017, dated April 13, 2005, Response to NRC RAI of FSS Final Report Nos. 1 and 2, Proposed Change No. 218, Supplement 19

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<sup>1</sup> This letter was erroneously dated "March 2, 2003" and should have been "March 2, 2005"