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September 15, 2005  
E910-05-060

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Subject: Saxton Nuclear Experimental Corporation (SNEC)  
Operating License No., DPR-4  
Docket No. 50-146  
Application for Termination of License

Gentlemen,

In accordance with 10 CFR 50.82(a)(9), this letter submits the SNEC facility application to the Nuclear Regulatory Commission (NRC) for termination of the GPU Nuclear, Inc. Operating (Possession Only) License No. DPR-4. Specifically, as detailed in the attached application, GPU Nuclear, Inc. has completed remaining radiological decommissioning and final radiation surveys of the SNEC facility and associated PENELEC area site in accordance with an NRC-approved license termination plan. The final radiation surveys demonstrate that the facility and site area meet the criteria for decommissioning and release of the site for unrestricted use stipulated in 10 CFR 20, Subpart E. Thus, GPU Nuclear has satisfied the requirements governing termination of a facility license that are stipulated in 10 CFR 50.82(a)(11), and requests that the NRC approve this application and terminate the GPU Nuclear, Inc. license by October 31, 2005.

If there are any questions regarding this letter, please contact Mr. A. F. Paynter of my staff at (717) 948-8425.

Sincerely,

A handwritten signature in black ink, appearing to read "J. J. Byrne".

J. J. Byrne  
Program Director, SNEC

Attachment – Application for Termination of License  
cc: NRC Project manager, NRR  
NRC Project Scientist, Region I

A061

## APPLICATION FOR TERMINATION OF LICENSE

10 CFR 50.82(a)(11) states:

*The Commission shall terminate the license if it determines that--*

*(i) The remaining dismantlement has been performed in accordance with the approved license termination plan, and*

*(ii) The final radiation survey and associated decontamination, including an assessment of dose contributions associated with parts released for use before approval of the license termination plan, demonstrate that the facility and site have met the criteria for decommissioning in 10 CFR part 20, subpart E.*

GPU Nuclear, Inc. has satisfied the criteria of 10 CFR 50.82(a)(11)(i) and (ii) as cited above that allow NRC termination of the SNEC facility license. Specifically, pursuant to 10 CFR 50.82(a)(11)(i), GPU Nuclear, Inc. has completed remaining dismantlement, including radioactive component removal and/or decontamination and confirmatory final radiation surveys, in accordance with the NRC-approved SNEC facility License Termination Plan (LTP). Radioactive plant components have been removed and disposed of, or have been decontaminated to levels well below regulatory site release criteria. Similarly, contaminated or activated portions of plant structures have either been decontaminated or removed and disposed. As detailed further below, final radiation survey of the site has also been completed in accordance with the NRC-approved SNEC facility License Termination Plan.

Pursuant to 10 CFR 50.82(a)(11)(ii), the final radiation survey and associated documentation demonstrate that the SNEC facility and PENELEC site areas have met the criteria for decommissioning in 10 CFR 20, Subpart E. Details of the final radiation survey results are documented in SNEC facility Final Site Survey Reports that have been submitted to the NRC for review and approval (see table on the following page). Collectively, these reports document the conclusion that the facility and site meet the radiological criteria in 10 CFR 20.1402 for release of the site for unrestricted use.

**Table 1, FSS Report - Submittal Listing**

<b>Title</b>	<b>Submittal Date</b>	<b>Letter No.</b>
FSS Report for CV Interior, 774' El. And Below	April 24, 2003	E910-03-016
FSS Report for CV Interior, 774' El. And Below	May 13, 2003	E910-03-021
FSS Report for CV Interior, 774' El. And Below, Rev 1	September 4, 2003	E910-03-031
FSS Report for CV Interior, 774' El. And Below, Rev 1, Errata	September 17, 2003	E910-03-035
FSS Report for SNEC CV Interior Above 774' EL. & Exterior	October 29, 2003	E910-03-041
FSS Report for SNEC PENELEC Line Shack	June 29, 2004	E910-04-018
FSS Report for SNEC PENELEC Line Shack, Revision 1	August 18, 2004	E910-04-023
Final Status Survey Report for the Containment Vessel Excavation	July 22, 2005	E910-05-013
FSS Report Open Land Area MA2	June 8, 2005	E910-05-016
FSS Report for Open Land Area OL5	June 8, 2005	E910-05-017
FSS Report for Open Land Area OL9	June 8, 2005	E910-05-018
FSS Report for East Yard Excavation OL 1-7	June 8, 2005	E910-05-019
FSS Report Open for Spray Pond Area SP1	June 8, 2005	E910-05-020
FSS Report for Open Land Area OL4	June 22, 2005	E910-05-022
FSS Report for Open Land Area MA9	June 22, 2005	E910-05-023
FSS Report for Open Land Area OL13	June 22, 2005	E910-05-024
FSS Report for Open Land Area OL11	June 22, 2005	E910-05-025
FSS Report for Open Land Area OL8	July 8, 2005	E910-05-029
FSS Report for PENELEC Switchyard	July 8, 2005	E910-05-030
FSS Report for Remediated Soils	July 14, 2005	E910-05-031
FSS Report - PENELEC Switch Yard Control Building	July 14, 2005	E910-05-032
FSS Report for OL6 and OL10	July 14, 2005	E910-05-033
FSS Report for Open Land Area OL7	July 22, 2005	E910-05-035
FSS Report for SSGS Firing Aisle	July 22, 2005	E910-05-036
FSS Report for SSGS Basement	July 22, 2005	E910-05-037
FSS Report for SSGS Seal Chambers	July 22, 2005	E910-05-038

**Table 1, FSS Report - Submittal Listing (continued)**

<b>Title</b>	<b>Submittal Date</b>	<b>Letter No.</b>
FSS Report for SSGS Discharge Tunnel Transition Area	July 22, 2005	E910-05-039
FSS Report for Open Land Area OL1 - Soils	July 26, 2005	E910-05-041
FSS Report for Open Land Area OL7 - Paved Surfaces And Concrete	July 26, 2005	E910-05-042
FSS Report for SSGS Structural Surfaces - Intake Tunnel	July 26, 2005	E910-05-043
FSS Report for SSGS Structural Surfaces - Discharge Tunnel	July 26, 2005	E910-05-044
FSS Report for SSGS Structural Surfaces - CV Steam Tunnel	July 26, 2005	E910-05-045
FSS Report for SSGS Spray Pump Area	July 27, 2005	E910-05-046
FSS Report for Seal Chamber Roofs	July 27, 2005	E910-05-047
FSS Report for Open Land Area OL3 - Paved Surfaces and Concrete	July 27, 2005	E910-05-048
FSS Report for Open Land Area OL2	July 27, 2005	E910-05-049
FSS Report for Residual Concrete in OL1	July 27, 2005	E910-05-050
FSS Report for Residual Macadam in OL1	July 27, 2005	E910-05-051
FSS Report for Open Land Area Survey Unit OL1-6	July 27, 2005	E910-05-052
FSS Report for Site Areas MA3/MA4 Weir Discharge Area	July 27, 2005	E910-05-053
FSS Report for Small PENELEC Garage GA1-1	July 27, 2005	E910-05-054
FSS Report for Embedded/Buried Piping	July 27, 2005	E910-05-055
FSS Report for Open Land Area OL3	July 27, 2005	E910-05-056

As indicated above, the SNEC facility Final Site Survey Reports document that the residual radioactivity associated with facility structures, systems, and components and site grounds meet the dose (25 mrem/y) and ALARA criteria specified in 10 CFR 20.1402.

**OTHER LICENSE TERMINATION CONSIDERATIONS**

A previous submittal issued March 1994 and titled, "Reactor Support Building Demolition Report", discussed the demolition and subsequent survey work of the reactor support buildings (e.g. the Control and Auxiliary Building). These facilities were demolished between June and September 1992, and along with the Radioactive Waste Disposal Facility (RWDF) and Yard Pipe Tunnel (demolished by 1989), were surveyed in accordance with survey methodology predating MARSSIM (Regulatory Guide 1.86). These earlier survey efforts were documented in the report titled, "SNEC Final Release Survey of the Reactor Support Buildings, Rev 3, March

1992. Following this earlier work report number 91/F-93 titled, "Confirmatory Radiological Survey for Portions of the Saxton Nuclear Experimental Facility (Independent Verification Survey)", by Oak Ridge Associated Universities (ORAU), for the NRC documented the validity and acceptability of this earlier dismantlement and subsequent survey work. In addition, License Amendment 11, dated May 28, 1992, allowed removal of these buildings but deferred Final Release until containment decommissioning and termination of the facility license. Finally, these earlier survey results were reviewed by an independent contractor (CoPhysics), retained by GPU Nuclear, who found the resulting TEDE to be well below the current criteria of  $\leq 25$  mrem/y. The report detailing this analysis was provided to the US NRC via GPU Nuclear letter E910-00-010 dated June 23, 2000, and was summarized in the SNEC LTP.

In preparation for termination of the Saxton Nuclear Experimental Facility license, GPU has reviewed the requirements of 10 CFR 50, as well as those contained in 10 CFR 20, and 10 CFR 30, and has identified several regulations requiring the forwarding of specified records to the appropriate NRC Regional Office prior to license termination. In GPU letter E910-05-061 to the NRC Region I submitted concurrently, GPU addresses these record-forwarding requirements and documents the manner in which they are satisfied.

#### SUMMARY

Based on the above, GPU Nuclear, Inc. has satisfied the requirements governing termination of a facility license that are stipulated in 10 CFR 50.82(a)(11). Therefore, on behalf of the SNEC facility operators, GPU Nuclear, Inc. respectfully requests that upon the acceptance of all Final Status Survey Reports (FSSR) and the resolution of all comments, the NRC approve this application and terminate the SNEC facility license by October 31, 2005.