



SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, P.O. Box 15830, Sacramento CA 95852-1830, (916) 452-3211
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

6

MPC&D 04-081

September 7, 2004

ATTN: Document Control Desk
Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Docket No.72-11
Rancho Seco Independent Spent Fuel Storage Installation
License No. SMN-2510

**REQUEST FOR AN EXTENSION OF TIME TO REQUEST A HEARING
REGARDING THE ADDITIONAL SECURITY MEASURES FOR ACCESS
AUTHORIZATION AT THE RANCHO SECO ISFSI**

Extension Request

Attention: Randy Hall

On August 18, 2004, the NRC issued an Order for additional security measures associated with access authorization at the Rancho Seco Independent Spent Fuel Storage Installation (ISFSI). Section IV of the Order states:

In accordance with 10 CFR 2.202, a licensee may request a hearing on this Order, within 20 days of the date of the Order. Where good cause is shown, consideration will be given to extend the time to request a hearing.

As required by Section III.C.1 of the Order, our response includes the proposed dates for completing any additional actions that may be required. Because of the unique nature of the situation that precipitated the issuance of the Order and the lack of any implementing guidance, we are not certain that our response and proposed implementation schedule are adequate for meeting the NRC's intent for complying with the requirements in Attachment 1 to the Order. Hence, we are not able to determine whether it is necessary to request a hearing until the NRC notifies us that our response satisfies the intent of the requirements in the Order.

Therefore, in accordance with Section IV of the Order, Rancho Seco requests an extension of time to file a request for a hearing until 20 days after the NRC has informed us of their determination regarding the acceptability of our response.

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions 3
FOIA- 2005-0047

C/6

If you, or members of your staff, have questions requiring additional information or clarification, please contact Bob Jones at (916) 732-4843.

Sincerely,

A handwritten signature in cursive script, appearing to read "Steve Redeker".

Steve Redeker
Manager, Plant Closure & Decommissioning

Cc: NRC, Region IV

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California }
County of Sacramento } ss.

On September 7, 2004 before me, Rachel R. Moore, Notary Public
Data Name and Title of Officer (e.g., "Jane Doe, Notary Public")
personally appeared Steve Redeker
Name(s) of Signer(s)

- personally known to me
- proved to me on the basis of satisfactory evidence



to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/hoer/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Rachel R. Moore
Signature of Notary Public

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document

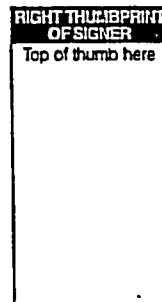
Title or Type of Document: Letter /chron #MPC+D 04-081
Document Date: 9-7-04 Number of Pages: 2
Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer

Signer's Name: Steve Redeker

- Individual
- Corporate Officer — Title(s): _____
- Partner — Limited General
- Attorney-in-Fact
- Trustee
- Guardian or Conservator
- Other: _____

Signer Is Representing: SMUD





SMUD

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"WITHHOLD ALL"
EXEMPTED #3

MPC&D 04-074

September 7, 2004

ATTN: Document Control Desk
Director, Spent Fuel Project Office,
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Docket No.72-11
Rancho Seco Independent Spent Fuel Storage Installation
License No. SMN-2510
**RESPONSE TO ORDER FOR ADDITIONAL SECURITY MEASURES FOR
ACCESS AUTHORIZATION AT RANCHO SECO ISFSI**

Attention: Randy Hall

Attached is our response to the NRC Order issued on August 18, 2004, regarding the additional security measures associated with access authorization at the Rancho Seco Independent Spent Fuel Storage Installation (ISFSI). Where we don't already comply with the additional security measures, we have begun implementation of the requirements and will complete implementation within 180 days from the date of the Order.

In a separate letter to the Director, Office of Nuclear Material Safety and Safeguards, we have requested an extension of time to file a request for hearing until 20 days after the NRC has informed us of their determination regarding the acceptability of our response.

The information attached to this transmittal letter is Safeguards Information. Accordingly, the attachment shall be afforded the protection under 10 CFR 73.21 and may not be placed in the Public Document Room. This transmittal letter, when separated from the attachment, is not Safeguards Information and may be placed in the Public Document Room.

If you, or members of your staff, have questions requiring additional information or clarification, please contact Bob Jones at (916) 732-4843.

Sincerely,



Steve Redeker
Manager, Plant Closure & Decommissioning

Cc: NRC, Region IV

Attachment

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

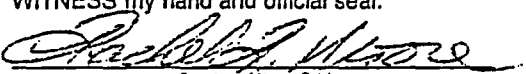
State of California }
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WITNESS my hand and official seal.

Signature of Notary Public

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Title or Type of Document: Letter, Chron # MSC #D 04-074
 Document Date: 9-7-04 Number of Pages: 7
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Capacity(ies) Claimed by Signer

Signer's Name: Steve Redeker
 Individual
 Corporate Officer — Title(s): _____
 Partner — Limited General
 Attorney-in-Fact
 Trustee
 Guardian or Conservator
 Other: _____

Signer Is Representing: SMUD

