



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

July 5, 2006

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 050-00312/06-002

Dear Mr. Shetler:

An NRC inspection was conducted on June 5 through 8, 2006, at your Rancho Seco Nuclear Generating Station. At the conclusion of the site visit, an exit briefing was conducted with the acting Plant Manager and other members of your staff. Subsequent to the site visit, on June 22, 2006, the inspector telephonically contacted the Plant Manager to provide additional information regarding the inspection findings. The enclosed report presents the scope and results of the inspection.

The 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 your auditing and corrective action program; maintenance and surveillance; decommissioning performance and status review; occupational radiation exposure; and final surveys. In addition, the staff from the Oak Ridge Institute for Science and Education (ORISE) conducted confirmatory radiation measurements. During this inspection, a violation of 10 CFR 20.2001 related to the improper disposal of a small amount of licensed material was reviewed. This non-repetitive and licensee corrected violation is being treated as a Non-Cited Violation, consistent with Section VI.A.8 of the NRC Enforcement Policy.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/Adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction.

Should you have any questions concerning this inspection, please contact Mr. Emilio Garcia, Health Physicist, 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 No.: 050-00312
License No.: DPR-54

Enclosure:
NRC Inspection Report
050-00312/06-002

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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No.: 050-00312

License No.: DPR-54

Report No.: 050-00312/06-002

Licensee: Sacramento Municipal Utility District

Facility: Rancho Seco Nuclear Generating Station

Location: 14440 Twin Cities Road
Herald, California

Dates: June 5 through 8, 2006

Inspector: Emilio M. Garcia, Health Physicist

Approved By: D. Blair Spitzberg, Ph.D., Chief
Fuel Cycle and Decommissioning Branch

Attachments: Supplemental Information
Partial List of Documents Reviewed

EXECUTIVE SUMMARY

Rancho Seco Nuclear Generating Station NRC Inspection Reports 050-00312/06-002

This inspection was a routine, announced inspection of decommissioning activities being conducted at the Rancho Seco Nuclear Generating Station. Areas inspected included self-assessment, auditing and corrective action; maintenance and surveillance; decommissioning performance and status review; occupational radiation exposure; and final surveys.

Self-assessment, Auditing and Corrective Action

- The licensee was effectively maintaining their Corrective Action Program to control the identification, evaluation, and resolution of problems. Audits conducted in calendar year 2005 and scheduled for calendar year 2006 addressed all facility activities required to be audited. All lead auditors for calendar years 2005 and 2006 audits met qualification requirements (Section 1).

Maintenance and Surveillances

- The licensee no longer had any safety-related structures, systems or components. The licensee continued to maintain their liquid effluent monitor. Checks and calibrations of the liquid effluent monitor had been conducted at the required intervals (Section 2).

Decommissioning Performance and Status Review

- The licensee continued the dismantlement and removal of contaminated components in a safe manner (Section 3).

Occupational Radiation Exposure

- A violation of 10 CFR 20.2001 was identified related to the unauthorized disposal of a small amount of contamination on an article of personal clothing which was later detected by another licensee. In accordance with NRC guidance, this non-repetitive, licensee corrected violation is documented as a non-cited violation (Section 4).

Inspections of Final Surveys

- Confirmatory measurements of the dome of the containment building and previously collected soil samples were conducted by the staff of the Oak Ridge Institute for Science Education, contractors to the NRC. The results of these surveys will be reported in a later separate addendum to this report (Section 5)

Report Details

Summary of Facility Status

The Rancho Seco Nuclear Generating Station was permanently shut down in June 1989. All spent reactor fuel has been moved to an onsite Independent Spent Fuel Storage Installation (ISFSI). At the time of this inspection, the licensee was conducting decommissioning activities at the site. Decommissioning was being performed under the provisions of the incremental decommissioning option of Rancho Seco's Post Shutdown Decommissioning Activities Report dated March 20, 1997.

Decommissioning work activities included the auxiliary building, reactor building, spent fuel building and exterior areas. All major components in the auxiliary building had been removed, packaged and shipped for disposal. In the reactor building, the major piping, the four reactor coolant pumps, the core flood tanks, reactor vessel head, pressurizer drain tank, and the two steam generators had been removed, packaged and shipped offsite for disposal. In the fuel handling building, the spent fuel pool water had been processed and released. The pool liner plates had been cut, removed and shipped for disposal. During this inspection, the reactor vessel internals segmentation project was being completed. All cuts had been made and segments packaged. Segmentation pool water cleanup was in progress.

1 Self-assessment, Auditing, and Corrective Action (IP 40801)

1.1 Inspection Scope

The inspector reviewed the licensee's administrative procedures that control the identification, evaluation, and resolution of problems; the Quality Assurance (QA) Plan; and other controlled documents for the conduct of QA audits and surveillances. The inspector also reviewed the licensee's QA audit organization, staffing, and qualifications.

1.2 Observations and Findings

a. Identification, Evaluation, and Resolution of Problems

The licensee's program for the resolution of non-conformances, material or programmatic deficiencies, or conditions adverse to quality or safety remained as described in Section 1.2a of Inspection Report 50-312/2002-004, Section 2.2a of Inspection Report 50-312/2003-004 and Section 1.2 of Inspection Report 50-312/2005-002. This program was called the Rancho Seco Corrective Action Program. Table 1 lists the applicable procedures of the Corrective Action Program. Two of these procedures had been revised since this area was last inspected in May 2005: Rancho Seco Administrative Procedure (RSAP)-0206, Commitment Management Review Group & Compliance Management Tracking System and RSAP-1301, Corrective Action Program.

RSAP-0260 was revised to incorporate the District-wide compliance management tracking system, and to revise definitions, responsibilities, and forms to be used with the new system.

RSAP-1301 was revised for minor editorial changes to improve clarity and to remove and update out-of-date references. These changes did not diminish the licensee's program for the identification, evaluation, and resolution of safety related problems.

Table 1
Rancho Seco Corrective Action Program Procedures

Number	Title	Rev.	Effective
RSAP-0102	Stop Work Order	6	Mar 03, 1994
RASP-0260	Commitment Management Review Group and Commitment Tracking Systems	13	Jan 09, 2006
RSAP-1301	Corrective Action Program	6	Sep 14, 2005
RSAP-1305	Corrective Action Request	3	Dec 09, 1993
RSAP 1308	Potential Deviation from Quality	17	Feb 13, 2003
RSAP-1310	Deviation from Quality	8	Sep 24, 2002

In calendar year 2005, 27 Potential Deviation from Quality (PDQ) reports were initiated and 2 out of these 27 were determined to be a Deviation from Quality (DQ). No Corrective Action Requests or Stop Work Orders were initiated in calendar year 2005. As of June 8, 2006, 14 PDQs had been initiated during the calendar year with 3 of the 14 determined to be Deviation from Quality. One was pending review. No Corrective Action Request or Stop Work Orders had been initiated in 2006. The inspector reviewed the list of PDQs and DQs that remained open. There were 11 open items, including 3 opened in 2006. The oldest item was from calendar year 2004. The inspector concluded that the licensee was appropriately addressing the timely resolutions of these open items.

The inspector reviewed selected records of recent Commitment Management Review Group (CMRG) meetings and noted that the meeting frequency and group membership was as described in procedure RSAP-0260, Commitment Management Review Group and Commitment Tracking Systems. These records indicated that the CMRG was conducting initial reviews and characterizations of new PDQs. The CMRG was also assigning tasks, establishing priorities and reviewing proposed resolutions for PDQs and other identified problems. The inspector concluded that the licensee was effectively maintaining their Rancho Seco Corrective Action Program to control the identification, evaluation, and resolution of problems.

b. QA Audit Organization, Staffing, and Qualifications

The licensee's Quality Assurance Audit Organization and Staffing had changed since this area was last inspected in April 2005. The position of Superintendent, Quality Assurance/Licensing/Administration/Training was eliminated as of the end of May 2005,

when the incumbent retired. Responsibilities for leading the QA audit group was assigned to the Supervising Quality Engineer. Besides the Supervising Quality Engineer there were two other full time auditors and, on occasion, specialists were tasked with leading or participating in audits. Records reviewed indicated that all audits conducted in 2005 and as of June 8, 2006, were led by auditors with current certifications.

The inspector reviewed records of audits conducted since this area was last inspected in April 2005. The licensee had conducted 15 audits in calendar year 2005 and had completed 1 audit in calendar year 2006, with 1 more underway. A total of 10 audits were scheduled to be performed in CY 2006. One of the reports in calendar year 2006 audits had been issued as of the time of the inspection. Audits conducted in calendar year 2005, and to be conducted in calendar year 2006, addressed all 34 facility activities listed in Rancho Seco Quality Manual Section XVIII at the required frequency.

In calendar year 2005, the licensee had conducted 28 surveillances and as of June 8, 2006, the licensee had conducted 15 surveillances in calendar year 2006. The inspector selected audit reports 05-A-007, 05-A-013 and 06-A-004 and surveillance reports 05-S-017, 06-S-006 and 06-S-012 for review. The inspector confirmed that the audit and surveillances were conducted per the commitments in the Rancho Seco Quality Manual. The individuals that conducted the audit and surveillances were independent of the areas being audited. The audits used approved checklists. The audit team personnel were qualified and were authorized to perform the audits or surveillances in the areas audited. The audits and assessments were conducted in a timely manner.

1.3 Conclusion

The licensee was effectively maintaining their Corrective Action Program to control the identification, evaluation, and resolution of problems. Audits conducted in calendar year 2005 and scheduled for calendar year 2006 addressed all facility activities required to be audited. All lead auditors for calendar years 2005 and 2006 audits met qualification requirements.

2 **Maintenance and Surveillance (IP 62801)**

a. Inspection Scope

The inspector reviewed the status of required surveillances and testing. The inspector discussed this area with the Maintenance Superintendent and reviewed selected records.

b. Observations and Findings

With the relocation of the spent fuel to the ISFSI, the licensee no longer had any safety-related structures, systems or components (SSC) as defined in 10 CFR 50.65(b)(1), nor any non-safety-related SSC as defined in 10 CFR 50.65(b)(2). The licensee had reviewed their Maintenance Rule procedure and concluded that it was no longer

required with fuel in the ISFSI. With the processing of the water in the spent fuel pool, the potential for significant liquid effluent releases was greatly diminished; however, the licensee would still need to process water generated from the reactor vessel internals segmentation and the reactor vessel segmentation. The licensee had opted to maintain their liquid effluent radiation monitor.

The inspector reviewed the maintenance of liquid effluent radiation monitor, R-15017A. The licensee performed quarterly tests and annual calibrations of this monitor. Records maintained by the licensee indicated that the licensee had performed these surveillances at the required intervals.

The inspector interviewed the Maintenance Superintendent and reviewed a printout of the Rancho Seco Computerized Surveillance Schedule dated June 5, 2006. This document listed the status of surveillances and routine tests. Three routine tests or surveillances were beyond their due dates, but the licensee was pursuing resolution of the problems that caused the delays. None of these tests were related to safety-related structures, systems or components.

Major maintenance activities ongoing during the inspection were the repair of the motherboard for the controller of the Y-112 Interim Onsite Storage Building crane and the repair of the A-536 Reactor Building Purge Air Exhaust system.

c. Conclusion

The licensee no longer had any safety-related structures, systems or components. The licensee continued to maintain their liquid effluent monitor. Checks and calibrations of the liquid effluent monitor had been conducted at the required intervals.

3 Decommissioning Performance and Status Review (IP 71801)

a. Inspection Scope

The inspector interviewed cognizant personnel, reviewed selected documents and toured portions of the site to observe work activities including housekeeping, safety practices, fire loading and radiological controls.

b. Observations and Findings

The ISFSI Supervisor briefed the inspector on the status of the canister containing the greater than Class C (GTCC) waste. The GTCC waste was generated from the segmentation of the reactor vessel internals project. The licensee had loaded the canister with the GTCC basket. The canister contained in the transfer cask had been removed from the segmentation pool, the canister lid had been welded and the canister was under going vacuum drying. Since there was no source of heat in the contents of the canister vacuum drying was progressing slowly. The canister with the GTCC waste would eventually be stored in the ISFSI.

The licensee had completed the segmentation of the reactor vessel internals and had separated and packaged the irradiated components into the various waste categories.

The Dismantlement Superintendent - Operations briefed the inspector on schedules for reactor vessel segmentation, packaging, disposal, and on concrete removal in the fuel handling and reactor buildings.

Tours of the reactor, auxiliary, fuel handling, and turbine buildings were conducted to observe dismantling and decommissioning activities in progress. The work observed was being conducted in a safe and orderly manner. Radiological controls, including postings and barriers, were in place. Good housekeeping and fire protection practices were noted in areas observed.

c. Conclusion

The licensee continued the dismantlement and removal of contaminated components in a safe manner.

4 Occupational Radiation Exposure (IP 83750)

a. Inspection Scope

The inspector reviewed the circumstances related to a report received by the NRC from another licensee involving contamination identified on the clothing of a contractor employee who last worked at Rancho Seco.

b. Observations and Findings

On March 9, 2006, while performing an entrance whole body count on a contractor employee, V.C. Summer Nuclear Station staff identified cobalt-60 (Co-60) contamination on a pair of pants worn by the contractor employee. The contractor employee was last employed by Rancho Seco. When notified by V.C. Summer Nuclear Station of their findings, Rancho Seco staff opened problem report PDQ 06-0007 and conducted an evaluation. This PDQ was elevated to a DQ when reviewed by the Commitment Management Review Group.

V. C. Summer staff reported to Rancho Seco that their survey using a small article monitor determined that the activity was 19,755 disintegrations per minute (dpm) over the entire pair of pants. On February 23, 2006, the contractor had completed his work at Rancho Seco. When he last exited the radiologically controlled area the contractor was surveyed by personnel contamination monitor and no detectable contamination was identified. The contractor then received an exit whole body count. This whole body count detected Co-60 contamination. The whole body count identified 24.9 nano-curies of Co-60 or 921.3 dpm. A subsequent whole body count of the individual with his outside clothing removed determined that the contamination was not on the individual but only on his clothing, most likely his pants. The Rancho Seco staff reviewed the results of the whole body counts and decided that since the individual's clothing had successfully "passed" the personnel contamination monitor which constitutes the

instrument designed to prevent inappropriate release of licensed material on personal items, that no further action was required other than to advise the individual to wash his pants. Rancho Seco procedure RP.305.09A exempt from additional monitoring personal items successfully monitored by personnel contamination monitors. Thus, the monitoring of the pants by the whole body counter was not required. Rancho Seco staff did not at the time decontaminate the individual's pants nor confiscate them.

At the time of the inspection, the problem report was not closed but the evaluation performed had concluded that no licensee procedures had been violated. However, the licensee had identified the need to change its established practices to prevent the release of licensed material under these, or similar circumstances. The licensee modified their practice to require that all individuals who had visited their radiological controlled area receive their exit WB count in disposable paper suits and without wearing their personal items of clothing other than their underwear. Also if contamination was identified in any personal item, that item would be confiscated and not released to the individual until decontaminated. Subsequent to the inspection, on June 22, 2006, the Radiation Protection Superintendent informed the inspector that these practices had now been incorporated into the licensee's procedures.

Although the licensee's procedure RP.305.09A exempts from additional monitoring personal items successfully monitored by personnel contamination monitors, Rancho Seco, nonetheless, monitored the individual while he was wearing his pants and identified the contamination. Further, Rancho Seco permitted the individual to exit their restricted area with detectable licensed material on his pants. This is a violation of 10 CFR 20.2001, disposal of licensed material by an unapproved method. This non-repetitive, licensee corrected failure satisfies the criteria as a non-cited violation (NCV 050-00312/0601-01).

Records maintained by Rancho Seco indicated that their personnel contamination monitors had been calibrated using the vendor's procedure at the required frequencies and the instruments were checked weekly with an appropriate radiation source. Instruments failing the source check were declared inoperable until repairs were completed and they pass the source check. The inspector observed a source check of one of the personnel contamination monitors.

c. Conclusions

A violation of 10 CFR 20.2001 was identified related to the unauthorized disposal of a small amount of contamination on an article of personal clothing which was later detected by another licensee. In accordance with NRC guidance, this non-repetitive, licensee corrected violation is documented as a non-cited violation.

5 Inspection of Final Surveys (IP 83801)

a. Inspection Scope

Independent confirmatory radiological measurements were performed on the dome of containment and on historical soil samples previously collected and analyzed by the licensee. The status of onsite disposal was discussed.

b. Observations and Findings

On April 12, 2006, the licensee submitted their License Termination Plan (LTP) to NRC. This LTP included proposed derived concentration guide lines (DCGLs) for meeting the public dose limits after license termination. This LTP was under review by the NRC at the time of the inspection and the proposed DCGLs had not been accepted by NRC. The licensee recognized that the DCGLs had not yet been approved but had started conducting final status surveys expecting that the DCGLs would be approved.

Representatives from the Oak Ridge Institute for Science Education (ORISE) working for the NRC reviewed records of final status surveys of the dome of the containment building and conducted independent confirmatory radiological measurements of the dome. In addition six soil samples previously collected and analyzed by the licensee were sent to ORISE for independent evaluation. The results of these surveys will be reported in a separate addendum to this report.

The inspector inquired from the Dismantlement Superintendent - Radiological, if radioactive material had been disposed of by burial onsite. The Dismantlement Superintendent - Radiological stated that based on review of historical documents and discussion with personnel, the licensee had determined that no radioactive material had been disposed of by burial onsite. The Dismantlement Superintendent - Radiological stated that although this conclusion was not currently noted on either their Historical Site Assessment nor their License Termination Plan, he intended to revise at least one of these documents to record this conclusion.

c. Conclusion

Confirmatory measurements of the dome of the containment building and previously collected soils samples were conducted by the staff of the Oak Ridge Institute for Science Education, contractors to the NRC. The results of these surveys will be reported in a later separate addendum to this report.

7 Exit Meeting Summary

The inspector presented the inspection results to the acting plant manager and other members of licensee staff at the exit meeting on June 8, 2006. Subsequent to the site visit, the inspector contacted the licensee on June 22, 2006, to provide additional information regarding the inspection findings. The licensee did not identify as proprietary any information provided to, or reviewed by, the inspector.

ATTACHMENT 1

PARTIAL LIST OF PERSONS CONTACTED

Sacramento Municipal Utility District

M. Bua, Radiation Protection/Chemistry Superintendent
R. Decker, Final Status Survey Lead Engineer
J. Field, Engineering Superintendent
W. Hawley, Dismantlement Superintendent - Operations, Acting Plant Manager
R. Jones, Supervising Quality Engineer
D. Koontz, ISFSI Supervisor
L. Langley, Asset Protection Specialist
G. Pillsbury, Final Status Survey Lead Engineer
G. Roberts, Maintenance Superintendent
E. Ronningen, Dismantlement Superintendent - Radiological
P. Terry, Engineering

INSPECTION PROCEDURES USED

IP 40801	Self-assessment, Auditing and Corrective Action
IP 62801	Maintenance and Surveillances
IP 71801	Decommissioning Performance and Status Review
IP 83801	Inspections of Final Surveys

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

050-00312/0601-01	NCV	Disposal of a small amount of licensed material by an unauthorized means.
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Closed

050-00312/0601-01	NCV	Disposal of a small amount of licensed material by an unauthorized means.
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Discussed

None

LIST OF ACRONYMS

CFR	Code of Federal Regulations
CMRG	Commitment Management Review Group
Co-60	Cobalt-60
CTS	Commitment Tracking System
DCGLs	Derived Concentration Guide Lines
dpm	Disintegrations per Minute
DQ	Deviation from Quality
GTCC	Greater than Class C
IP	Inspection Procedure
ISFSI	Independent Spent Fuel Storage Installation
LTP	License Termination Plan
ORISE	Oak Ridge Institute for Science Education
PDQ	Potential Deviation from Quality
QA	Quality Assurance
RSAP	Rancho Seco Administrative Procedure
RSQM	Rancho Seco Quality Manual
SSC	Structures, Systems or Components

ATTACHMENT 2

PARTIAL LIST OF DOCUMENTS REVIEWED

Audits and Surveillances

- 2005 Surveillance Log
- 2006 Surveillance Log as of June 8, 2006.
- 2006 Quality Audit Schedule, dated December 20, 2005.
- 2005 Quality Audit Log
- 2006 Quality Audit Log as of June 8, 2006.
- Rancho Seco Audit Report No. 05-A-007, Rancho Seco Quality Assurance and Audit Program, Audit dates June 21 through July 27, 2005. Report dated August 4, 2005.
- Rancho Seco Audit Report No. 05-A-013, Fire Protection, Audit dates October 30 through December 28, 2005. Report dated January 25, 2006.
- Rancho Seco Audit Report No. 06-A-004, Control of purchased Material, Equipment, and Services Handling, Shipping, and Storage, Audit dates February 23 through March 28, 2006. Report dated March 30, 2006.
- Surveillance Report 05-S-017, Objective: Witness calibration of SMUD CTE-27705 Theodolite at California Surveying & Drafting Supply, Inc. Surveillance period September 30, 2005.
- Surveillance Report 06-S-006, Objective: Verify lack of foreign debris inside the GTCC basket and verify that the GTCC basket lid is installed properly. Surveillance period February 7, 2006.
- Surveillance Report 06-S-012, Objective: Verify that surveys in the upper parking lot are performed in accordance with the referenced instructions and procedures. Surveillance period May 17, 2006.
- Lead Auditor Certification records for Robert E. Jones, Michael L. Braum, Glenn R. Howard, Richard Mannheimer and Wayne Thomas.

Data Sheets

- Potential Deviation from Quality Log, 2005 and 2006 through June 8, 2006.
- Rancho Seco Work Order 18013180, A-536 Reactor Building Purge Air Exhaust. As of June 6, 2006.
- Rancho Seco Work Order 18013300, A-536 Reactor Building Purge Air Exhaust. As of June 6, 2006.

- Rancho Seco Computerized Surveillance Schedule printout as of June 6, 2006.
- SP.418A, Quarterly Test of Liquid Effluent Radiation Monitor (R-15017A), performed December 5, 2005.
- SP.418A, Quarterly Test of Liquid Effluent Radiation Monitor (R-15017A), performed December 8, 2005.
- SP.418A, Quarterly Test of Liquid Effluent Radiation Monitor (R-15017A), performed March 14, 2006.
- SP.418A, Quarterly Test of Liquid Effluent Radiation Monitor (R-15017A), performed June 1, 2006.
- Deviation from Quality 06-0007, Release of worker's clothing after identifying Co-60 contamination during exit whole body count, and associated records as of June 14, 2006.

Meeting Minutes

- CMRG Meeting Held on February 9, 2005.
- CMRG Meeting Held on April 27, 2005.
- CMRG Meeting Held on June 30, 2005.
- CMRG Meeting Held on July 27, 2005.
- CMRG Meeting Held on August 3, 2005.
- CMRG Meeting Held on September 14, 2005.
- CMRG Meeting Held on October 12, 2005.
- CMRG Meeting Held on February 14, 2006.
- CMRG Meeting Held on February 23, 2006.
- CMRG Meeting Held on April 12, 2006.

Procedures

- Rancho Seco Administrative Procedure RSAP-0260, Commitment Management Review Group & Compliance Management Tracking System, Revision 13, effective January 9, 2006.

- Rancho Seco Administrative Procedure RSAP-1301, Corrective Action Program, Revision 6, effective September 14, 2005.