



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

April 11, 2007

Mr. John S. Keenan
Senior Vice President – Generation and Chief Nuclear Officer
Pacific Gas and Electric Company
P.O. Box 770000, Mail Code B32
San Francisco, California 94177-0001

SUBJECT: NRC INSPECTION REPORT 050-00133/07-001

Dear Mr. Keenan:

An NRC inspection was conducted on March 19 - 23, 2007, at your Humboldt Bay Power Plant Unit 3 facility. This inspection was an examination of activities conducted under your license as they relate to safety and compliance of the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection included reviews of your solid radioactive waste management and transportation of radioactive materials. On March 23, 2007, at the conclusion of the site visit, an exit briefing was conducted with Mr. Terry Nelson, Plant Manager, and other members of your staff. The enclosed report presents the scope and results of that inspection.

Based on the results of this inspection, the NRC has determined that a violation of NRC requirements occurred. This violation is discussed in section 6.0 of the enclosed report and involved a failure to implement applicable procedures when two floor drain plugs at the -14 foot elevation Valve Gallery were removed and no entries were made into the Sealed Component Change Log, thus the drains were not tracked as being open. Had a Tsunami occurred, the open drain could have led to flooding of the lower levels of the reactor building. The flooding of the reactor building is not an accident which would impact the safety and security of the spent fuel, but the failure to maintain control over the status of drain plugs bring into question the status of other sealed components. This violation is being treated as a Non-Cited Violation (NCV) consistent with Section VI.A. of the Enforcement Policy. This violation is not being cited, in part, because your staff took prompt initial corrective actions and entered the deficiencies into the corrective action system. The NCV and the circumstances surrounding the violation are described in the subject inspection report. If you contest the violation or severity level of the NCV, you should provide a response within 30 days of the date of this inspection report with the basis for your denial to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, along with copies to the Regional Administrator, U. S. Nuclear Regulatory Commission, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas, 76011; and the Director, Office of Enforcement, U. S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

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 the undersigned at (817) 860-8191 or Emilio M. Garcia at (530) 756-3910.

Sincerely,

/RA R. J. Evans for/

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

Docket No.: 050-00133

License No.: DPR-7

Enclosure:

NRC Inspection Report 050-00133/07-001

cc w/enclosure:

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Pacific Gas and Electric Company

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 X Publicly Available X Non-Sensitive

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04/10/2007	04/11/2007

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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No.: 050-00133

License No.: DPR-7

Report No.: 050-00133/07-001

Licensee: Pacific Gas and Electric Company (PG&E)

Facility: Humboldt Bay Power Plant (HBPP), Unit 3

Location: 1000 King Salmon Avenue
Eureka, California 95503

Dates: March 19 - 23, 2007

Inspectors: Emilio M. Garcia, Health Physicist

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

Attachments: Supplemental Inspection Information

ADAMS Entry: IR 05000133-07-01, on 03/19-23/07; Pacific Gas & Electric Co.;
Humboldt Bay, Unit 3. One NCV.

EXECUTIVE SUMMARY

Humboldt Bay Power Plant, Unit 3 NRC Inspection Report 050-00133/07-001

The Humboldt Bay Power Plant (HBPP), Unit 3 was shutdown in 1976. The facility has been in a SAFSTOR status since shutdown with minimal decommissioning activity. This routine inspection was conducted to review the licensee's organization and management controls, safety reviews, design changes and modifications, audits, spent fuel safety, maintenance and surveillances, decommissioning performance, solid radioactive waste management and transportation of radioactive materials.

Organization, Management and Cost Controls

- The licensee had sufficient staff to conduct the work in progress, including an ample number of certified fuel handlers. The onsite and offsite review committees were functioning in accordance with quality assurance program requirements. The licensee's nuclear safety concerns program provided employees an alternative mechanism to report safety concerns, impartially and independent from their direct supervision (Section 1).

Safety Reviews, Design Changes, and Modification

- The licensee's safety review program was conducted in compliance with 10 CFR 50.59 requirements. The licensee's non-conformance program had been implemented in compliance with Quality Assurance Plan requirements (Section 2).

Self-Assessment, Auditing, and Corrective Action

- Audits had been conducted for the required subject areas at the required frequencies. The auditors were certified in accordance with licensee requirements and were independent of the areas audited (Section 3).

Spent Fuel Pool Safety

- The licensee was maintaining the spent fuel pool water level and water chemistry in accordance with Technical Specifications requirements and Defueled Safety Analysis Report commitments (Section 4).

Maintenance and Surveillance

- The licensee had implemented a program to meet the requirements of the Maintenance Rule provided in 10 CFR 50.65 (Section 5).

Decommissioning Performance and Status Review

- Radiological conditions of the facility were properly posted. Housekeeping and facility conditions were effectively controlled. A violation involving the failure to implement procedures related to control of sealed components was identified by the inspector.

This violation is of low safety significance and meets the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600, for being dispositioned as a Non-cited Violation (Section 6).

Solid Radwaste Management & Transportation of Radioactive Materials

- The licensee had implemented and maintained a transportation program for radioactive materials and radioactive waste in accordance with NRC and U.S. Department of Transportation regulations (Section 7).

Report Details

Summary of Plant Status

Humboldt Bay Power Plant, Unit 3, is currently in decommissioning SAFSTOR status. Unit 3 received an operating license from the Atomic Energy Commission on August 28, 1962. On July 2, 1976, Unit 3 was shutdown for annual refueling and seismic modifications. This work was suspended in December 1980, and in June 1983, PG&E announced its intention to decommission the unit. Unit 3 has been essentially in SAFSTOR since July 1985. On July 19, 1988, NRC approved the licensee's SAFSTOR plan and amended the license to a possess-but-not-operate status. The license will expire on November 9, 2015. The facility has undergone minimal decommissioning activities since shutdown.

1.0 Organization, Management, and Cost Controls (36801)

1.1 Inspection Scope

The inspector reviewed site staffing, the onsite and offsite safety review committees, and nuclear safety concerns program, for compliance with regulatory requirements, site procedures, and licensee commitments.

1.2 Observations and Findings

a. Site Organization

Technical Specifications 5.2.1 provides the requirements for the onsite and offsite organizations necessary for the safe storage of irradiated fuel. The onsite nuclear organization chart was provided in site procedure Humboldt Bay Administrative Procedure (HBAP) A-1, HBPP Organization and Staff Qualifications," Appendix 6.4, Revision 25. This procedure had not been revised since the last inspection in September 2006. The inspector compared the actual structure in place at the time of the inspection to the procedure requirements. All staff positions had been filled, except one. The position of Decommissioning Project Manager remained opened as of the time of the inspection. The position of Unit 3 Operations Manager was to be added to the organization to reduce the workload of the current Unit 3 Supervisor who was currently responsible for both operations and maintenance work. Both of these manager positions had been posted internally with closure dates in mid and late April 2007. The position of Unit 3 Supervisor was filled with an interim appointment. In summary, the inspector concluded that the licensee had sufficient staff for the work in progress.

Section 5.2.2 of Technical Specifications states that at least one certified fuel handler (CFH) shall be onsite when fuel is in the spent fuel pool (SFP). As of March 22, 2007, there were 14 CFHs employed by the licensee. The inspector determined that the licensee had sufficient staff to ensure compliance with Technical Specifications requirements for availability of CFHs.

b. Onsite and Offsite Review Committees

The Quality Assurance Plan, Revision 20, provides the requirements for the Plant Safety Review Committee (PSRC) and the Nuclear Safety Oversight Committee (NSOC). The inspector reviewed the implementation of the committees to ensure compliance with quality assurance program requirements.

The PSRC was the onsite group that reviewed proposed changes, tests and experiments, plant modifications, procedure revisions, and other issues having nuclear safety significance. Including routine and special meetings, during 2006, the PSRC met 75 times. As of March 21, 2007, the PSRC met 6 times during 2007. The PSRC meeting minutes were reviewed. Minutes documented that the quorum requirements had been met and provided a list of all subjects reviewed. The committee reviewed and approved, as appropriate, proposed procedure changes, temporary procedures, plant modifications, negative trends, and non-conformances. Reasons were documented when proposed changes or procedures were rejected by the committee.

The NSOC provided high level review and oversight of site activities including the PSRC. The NSOC was required to meet at least twice per year. The only site person that was a member of this committee was the plant manager. The committee met on April 7, 2006, and on November 8, 2006. The minutes for the November meeting were reviewed. A quorum was present, and the committee reviewed relevant issues.

c. Nuclear Safety Concerns Program

The licensee had established a nuclear safety concerns program to provide employees with an alternate opportunity to have concerns impartially and independently examined. This program remained as described in Inspection Report 05000133/2006003. The inspector interviewed the Employee Concerns Program Supervisor. The Supervisor described the status of the program including number of concerns received. The Employee Concerns Program was common to both nuclear sites operated by Pacific Gas and Electric Company, HBPP and Diablo Canyon.

Program requirements were described in implementing procedure OM3-ID3, "Employee Concerns Program," Revision 10. This procedure had not been revised since this area was last inspected. Employees could submit concerns via U.S. Postal Service mail, electronic mail, or telephone hot line. The licensee provided a local contact at the site for consultation. Reminders about the Employee Concerns Program were included in annual general employee training, new employee training, site posters, and brochures that were available onsite.

Procedure HBAP A-3, "HBPP Employee Check-In/Out Instructions and Responsibility and I/Q Use," Revision 10A, includes directions for conducting exit interviews with departing employees. This procedure includes an interview form and a interview by the HBPP Quality Assurance Supervisor or Employee Concerns Program staff.

1.3 Conclusions

The licensee had sufficient staff to conduct the work in progress, including an ample number of certified fuel handlers. The onsite and offsite review committees were functioning in accordance with quality assurance program requirements. The licensee's nuclear safety concerns program provided employees an alternative mechanism to report safety concerns, impartially and independent from their direct supervision

2.0 **Safety Reviews, Design Changes, and Modifications (37801)**

2.1 Inspection Scope

The inspector conducted reviews of the licensee's design change and nonconformance programs to ensure compliance with the requirements of 10 CFR 50.59 and Quality Assurance Plan requirements.

2.2 Observations and Findings

a. Design Change Process

Licensee procedure HBAP C-19, "Licensing Basis Impact Evaluation (LBIE)," Revision 21, establishes the requirements for evaluating potential effects on licensing basis documents from proposed changes to the facility, procedures, test or experiments. This procedure was used to determine if 10 CFR 50.59 evaluations were required and whether prior NRC approval was required before implementing the changes. The inspector reviewed selected design change packages to ascertain whether the changes included a safety review or safety screening and adequate explanation of the change being proposed. The inspector reviewed three design change notices. Each package included a safety screen that included consideration of the requirements of 10 CFR 50.59. Other attributes considered included impacts on decommissioning and whether changes were required to be implemented in licensing basis documents, site procedures, and site drawings. All safety screens were complete. None of the changes involved a full safety evaluation. Further, the design change notices provided sufficient detail to explain what was being changed.

b. Nonconformance Reports

Section 3.1.4 of the Quality Assurance Plan states that measures shall be established for documenting, reviewing, and dispositioning of quality problems and non-conformances. During 2006, four non-conformance reports (NCRs) were opened. The NCRs were discussed in inspection report 05000133/2006003. No additional NCRs had been opened. At the time of this inspection, three of the 2006 NCRs remained open pending completion of corrective actions to prevent recurrence (CAPR).

The licensee was identifying and correcting conditions adverse to quality.

2.3 Conclusions

The licensee's safety review program was conducted in compliance with 10 CFR 50.59 requirements. The licensee had established and implemented a non-conformance program that was in compliance with Quality Assurance Plan requirements.

3.0 **Self-Assessment, Auditing, and Corrective Action (IP 40801)**

3.1 Inspection Scope

The inspector reviewed the licensee's quality assurance audit organization, staffing, and qualifications for compliance with regulatory requirements.

3.2 Observations and Findings

The licensee's Nuclear Quality Verification Organization was based at Diablo Canyon with the Supervisor HBPP Quality Assurance located at Humboldt Bay but reporting to Manager Nuclear Verification who reported directly to the Senior Vice President - Generation and Chief Nuclear Officer.

Licensee's Quality Assurance SAFTOR procedure (QASP)-8, "Audit Program," Revision 10, described the licensee's system for conducting and documenting audits to verify compliance with the licensee Quality Assurance Program. Attachment 5.1 of this procedure specified the 14 audit subject areas and required audit frequencies. Two relatively new subject areas were the Fitness for Duty Program and the Unescorted Access Program. Records maintained by the licensee documented that audits in the applicable subject areas had been conducted at the required frequency over the last two years. The inspector reviewed records of audits conducted since this area was last inspected in January 2006. The licensee had completed five additional audits covering eight audit areas; namely, Corrective Actions, Security, Plant Staff Performance Training & Qualifications, Technical Specifications and License Conditions, Radiation Protection, Radioactive Material Packaging and Transportation and Radioactive Waste Processing and Process Control. The licensee concluded that each of the programs had been effectively implemented. The audits appeared to be thorough and comprehensive. Areas of good performance and areas for improvement were normally present in each of the licensee audits. The frequency of the audits met the timeliness requirements of Procedure QASP-8, "Audit Program." Problems identified during the audits had been entered into the HBPP corrective action system as a SAPNs, as required by Section 2.3 of Procedure QASP-5, "Corrective Action Program," Revision 10.

Procedure TQ1.NQ1, "Auditor Qualification and Certification," Revision 8, provided the requirements for the qualification and certification of quality auditors. A review of auditor qualification records indicated that the individuals conducting these audits had been certified.

The licensee had an ongoing program of self assessments. During 2006, and as of March 22, 2007, the licensee had conducted and documented self assessments on 24 topics.

3.3 Conclusions

Audits had been conducted for the required subject areas at the required frequencies. The auditors were certified in accordance with licensee requirements and were independent of the areas audited.

4.0 **Spent Fuel Pool Safety (60801)**

4.1 Inspection Scope

The inspectors reviewed the licensee's control of the SFP to ensure compliance with Technical Specifications requirements and Defueled Safety Analysis Report (DSAR) commitments.

4.2 Observations and Findings

The inspector conducted a tour of the SFP area and reviewed plant records to ensure the safe storage of the fuel and other irradiated items in the pool. Technical Specifications 3.1.1 states that the SFP water level shall be at an elevation of greater than 10.5 feet. At the time of the inspection, the water level was 10.82 feet. The inspectors also confirmed that the low water level alarm was set at 10.67 feet as required by the DSAR.

Technical Specifications 3.1.3 states that the SFP liner water level shall be at an elevation less than +9 inches (0.75 feet). The liner water level was -0.04 feet during the inspection. The inspector also confirmed that the licensee was monitoring both SFP level and liner water level at the frequencies established in Technical Specifications surveillance requirements.

To prevent inadvertent drainage of the SFP, the licensee had sealed the stop valve on the SFP drain, removed the piping beyond the stop valve and placed a blind flange on the pipe stem. On March 21, 2007, the inspector toured the pipe gallery area and verified that these were the conditions of SFP drain. The inspector also verified that procedure HBAP C-9 #1 listed the SFP drain stop valve as sealed or locked valve.

Section 2.3.1.1 of the DSAR states that two sources of makeup water will be maintained for the SFP. The inspectors interviewed operations staff personnel and determined that the two water sources were the demineralized water storage tank and fire water. The DSAR specifies that a minimum of 2,000 gallons shall be maintained in the demineralized water storage tank. The demineralized water storage tank level indicator displays tank level in inches. The 2000 gallon limit amounts to 53.5 inches. On March 21, 2007, the tank level was 71.2 inches or 3070 gallons. In addition, the fire water system was available for emergency supply of water.

Table 5.2 of the DSAR provides the limits for SFP water chemistry and radioactivity levels. Details of this requirement were documented in site procedure STP 3.6.5, "Monthly Spent Fuel Pool Water Quality Check," Revision 44. The pool water was routinely sampled for pH, conductivity and cesium-137 activity. The inspectors reviewed the plant records for March 2006 through February 2007. The licensee had collected

pool water samples on a monthly frequency as required by the DSAR and had analyzed the samples for the required chemical constituents. Since March 2006, all parameters remained within DSAR limits.

During 2006, the SFP demineralizer was out of service for months due to a number of problems. On October 10, 2006, the licensee returned the SFP demineralizer to service. Since that time, the licensee observed increases on the differential pressure across the SFP demineralizer, but no significant decrease in the effectiveness of the resin. The licensee concluded that the increased differential pressure was due to the demineralizer acting as a filter and collecting particulate mater from the SFP water. A new differential pressure and conductivity recorder with digital readout was installed and was declared operable on March 21, 2007. The licensee was tracking this differential pressure and was making preparations to replace the demineralizer contents if necessary.

The metal objects identified during the September 2006 inspection in the vicinity of the energy absorber remained in an interim storage container pending development of a procedure for their evaluation. Although the evaluation has not been performed these items do not appear to be special nuclear material to knowledgeable licensee personnel.

4.3 Conclusions

The licensee was maintaining the SFP water level and water chemistry in accordance with Technical Specifications requirements and Defueled Safety Analysis Report commitments.

5.0 Maintenance and Surveillance (IP 62801)

5.1 Inspection Scope

The inspector reviewed the licensee's maintenance and surveillance program for compliance with the Maintenance Rule requirements, 10 CFR 50.65.

5.2 Observations and Findings

The licensee's maintenance program remained generally as described in Inspection Report 05000133/2005003. Administrative procedures HBAP C-40, "Maintenance Program," and HBAP C-40 #1, "Maintenance Rule Compliance," described the licensee's program for complying with the Maintenance Rule. The licensee had identified 17 Structure, System or Components (SSCs) that were subjected to the Maintenance Rule. The licensee had developed surveillance test procedures (STPs) to monitor the SSCs subject to the Maintenance Rule as required by 10 CFR 50.65(a)(1).

The inspector reviewed the licensee method to assure the timely conduct of STPs. The licensee use administrative procedure HBAP C-3#2, "Scheduling of Plant and Equipment Tests" for keeping the STP schedules updated and for issuing the weekly reminders to the test coordinators. The STP schedule and weekly reminders were maintained in paper records. The licensee was in the process of developing a computer based system to update the STP schedule and to generate the weekly reminders.

The STP schedule had been maintained. The function of Surveillance Test Coordinator had been reassigned to the Unit 3 Supervisor on August 1, 2006.

5.3 Conclusions

The licensee had implemented a program to meet the requirements of the Maintenance Rule provided in 10 CFR 50.65.

6.0 **Decommissioning Performance and Status Review (IP 71801)**

6.1 Inspection Scope

The inspector conducted tours of the site to evaluate whether facility conditions were being effectively controlled during SAFSTOR.

6.2 Observations and Findings

The inspector toured the fuel handling building, the Unit 3 control room, and other areas of the facility. Radiological postings were visible and met the requirements of 10 CFR Part 20. Housekeeping and facility conditions were effectively controlled. Most of the areas in the facility were free of radiological contamination and were accessible without the need of protective clothing. No safety concerns were observed during the tours. The control room indicators associated with monitoring SFP water and liner levels were confirmed to be functional.

The inspector conducted confirmatory radiation surveys using Ludlum Model 2401-EC survey instrument, NRC property number 21176G, due for calibration on August 4, 2007. The inspector's survey results were comparable to those performed by the licensee.

On March 21, 2007, during a tour of Unit 3, the inspector and a member of the licensee staff observed that one of the floor drain plugs at the -14 foot elevation Valve Gallery was not installed. As noted in Procedure HBAP C-9#1, "Sealed Components Checklist and Log," this plug should have been installed. Investigation of when and why the plug had been removed led to an interview with the individuals that removed it. Personal records maintained by a radiation protection technician and the recollections of a decontamination technician indicated that both drain plugs at the -14 foot elevation Valve Gallery were removed on August 18, 2006, and only one was replaced on that date. The drain plugs were removed by the decontamination technician after consultation with his supervisor and the Unit 3 Supervisor. The plugs were removed to facilitate decontamination of the area and removal of some standing water. Neither the radiation protection technician nor the decontamination technician could recall any identification tag adjacent to either floor drain plug. Procedure HBAP C-9 recommends that "Sealed components should be identified by a color coded Identification Tag." Only one of the plugs was replaced on August 18, 2006. The other plug was damaged and not replaced. The decontamination technician told the inspector that he was not aware of the requirement to make an entry into the Sealed Component Change Log, and he did not make an entry into this log when he removed the plugs.

Shortly after the Unit 3 Supervisor became aware that a plug was missing, he arranged to have it installed. On March 22, 2007, licensee management initiated problem report SAPN 1242745 to evaluate this problem and to verify the status of other sealed components listed in HBAP C-9 #1. As of the end of the inspection, the status of most sealed components had been verified. Although all components were in the correct positions, three additional valves were found to be unsealed. The licensee intended to verify the status of remaining Unit 3 sealed components listed in HBAP C-9 #1. On March 22, 2007, the Sealed Component Log was updated to reflect the removal and replacement of the -14 floor drain plugs. Also, information tags were placed on the these drain plugs.

HBPP Technical Specification 5.5.1.a. required, in part, that written procedures shall be established, implemented and maintained for the safe storage of irradiated fuel recommended in Appendix "A" of Regulatory Guide 1.33, February 1978. Appendix A to Regulatory Guide 1.33, February 1978, recommends, among others, administrative procedures for equipment control (e.g. locking and tagging) and bypass of Safety Functions and Jumper Control. Step 4.4.1 of procedure HBAP C-9, "Sealed Components and Independent Verification," required that when a sealed component is removed, the date, time, component number, reason for removal and initial of the individual performing the removal be recorded into the Sealed Component Change Log. Contrary to this, on August 18, 2006, two floor drain plugs at the -14 foot elevation Valve Gallery, sealed components listed in procedure HBAP C-9 #1, "Sealed Components Checklist and Log," were removed and the date, time, component number, reason for removal and initial of the individual performing the removal were not recorded into the Sealed Component Change Log. This procedural violation was entered into the licensee's corrective action program as SAPN 1242745. This Severity Level IV violation is being treated as a Non-Cited Violation (NCV), consistent with Section VI.A of the NRC Enforcement Policy (NCV 50-133/0701-01).

6.3 Conclusions

Radiological conditions of the facility were properly posted. Housekeeping and facility conditions were effectively controlled. A violation involving the failure to implement procedures related to control of sealed components was identified by the inspector. This violation is of low safety significance and meets the criteria of Section VI of the NRC Enforcement Policy for being dispositioned as a Non-cited Violation.

7.0 **Solid Radioactive Waste Management and Transportation (86750)**

7.1 Inspection Scope

The inspector reviewed the licensee's solid radwaste management and transportation of radioactive materials program to ensure compliance with NRC and U.S. Department of Transportation (DOT) regulations.

7.2 Observations and Findings

a. Audits and Assessments

The inspector reviewed EDMS #062500018, the biennial audit of the Radiation Protection, Radioactive Materials Packaging and Transportation, and Radioactive Waste Processing and Process Control Program. This audit was performed October 9 through 20, 2006. The individuals that conducted the audit were independent of the HBPP organization and did not report to any managers at HBPP. The majority of this audit addressed other areas of radiation protection beyond the solid radioactive waste management and transportation program. This audit identified 7 quality problems and made 17 recommendations. One of the quality problems and three recommendations related to the solid radioactive waste management and transportation program. The licensee had opened problem reports (SAP Notifications) for all quality problems and recommendations identified in the audit. As of the time of the inspection, the licensee had addressed the quality problem and recommendations related to the solid radioactive waste management and transportation program, but had not completed all of the actions.

b. Changes

There had been no significant changes in the licensee's organization, personnel, facilities, or equipment affecting the solid radwaste management and transportation of radioactive materials program since this area was last inspected in September 2006. Seven Radiation Control Procedures related to the solid radwaste management and transportation of radioactive materials program had been revised and had received PSRC review and approval.

c. Shipments

Records indicated that 15 shipments of radioactive material had been completed between January 1 and March 20, 2007. Three records were selected and reviewed by the inspector. These were for radioactive materials shipments RMS-07-002, RMS-07-003, and RMS-07-004. These three shipments were for the irradiated components removed from the SFP, including poison curtains and fuel channels. The records documented compliance with the applicable requirements of Title 49 of the Code of Federal Regulation. The emergency response telephone number listed on the shipping paper was confirmed as a telephone number staffed 24 hours a day. Documents that required shipper certification were signed by a contractor designated as radiological engineer. Training records of the individuals who signed or otherwise performed functions related to the transport of hazardous material were reviewed. The individuals involved with these shipments had received appropriate training as required by 49 CFR 172, Subpart H.

The Senior Radiation Protection Engineer stated that the licensee had not received any notices of non-compliance from DOT or other competent state authorities. The licensee maintained printed copies NRC and DOT regulations and had copies of the licenses of the designated recipients.

7.3 Conclusions

The licensee had implemented and maintained a transportation program for radioactive materials and radioactive waste in accordance with NRC and DOT regulations.

8.0 **Exit Meeting**

On March 23, 2007, at the conclusion of the site visit, the inspector presented to the plant manager and other licensee staff members the preliminary results of the inspection. The licensee did not identify as proprietary any information provided to, or reviewed by, the inspector.

ATTACHMENT 1

SUPPLEMENTAL INSPECTION INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee Personnel:

J. Albers, Radiation Protection Manager
M. Anthony, Decontamination Technician
J. Atchley, Operator Specialist
R. Burnside, Employees Concern Program Supervisor
C. Caldwell, Unit 3 Supervisor
J. Chadwick, Senior Radiation Protection Engineer
Z. Easley, Security Supervisor
J. Galle, Sr. Design Engineer
V. Jensen, Quality Control Supervisor
G. Mason, Quality Assurance Supervisor
T. Nelson, Plant Manager - Nuclear
L. Pulley, ISFSI Manager
M. Smith, Engineering Manager
D. Sokolsky, Licensing Supervisor
R. Sorensen, Programs Coordinator
R. Willis, Plant Manager Fossil

Contractors:

L. Carter, Radiation Protection Technician

INSPECTION PROCEDURES USED

IP 36801	Organization, Management, and Cost Controls
IP 37801	Safety Reviews, Design Changes, and Modifications
IP 40801	Self-Assessment, Auditing, and Corrective Action
IP 60801	Spent Fuel Pool Safety
IP 62801	Maintenance and Surveillances
IP 71801	Decommissioning Performance and Status Review
IP 86750	Solid Radwaste Management & Transportation of Radioactive Materials

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

50-133/0701-01	NCV	Failure to implement administrative procedures HBAP C-9, "Sealed Components and Independent Verification," and HBAP C-9 #1, "Sealed Components Checklist and Log," when sealed components were removed and no entries were made into the Sealed Component Change Log.
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Closed

50-133/0701-01 NCV Failure to implement administrative procedures HBAP C-9, "Sealed Components and Independent Verification," and HBAP C-9 #1, "Sealed Components Checklist and Log," when sealed components were removed and no entries were made into the Sealed Component Change Log.

Discussed

None

LIST OF ACRONYMS

CAPR	Corrective Actions to Prevent Recurrence
CFH	Certified Fuel Handler
CFR	Code of Federal Regulations
DOT	United States Department of Transportation
DSAR	Defueled Safety Analysis Report
EDMS	Electronic Document Management System
HBAP	Humboldt Bay Administrative Procedure
HBPP	Humboldt Bay Power Plant
IP	Inspection Procedure
I/Q	Instructions and Qualifications program
LBIE	Licensing Basis Impact Evaluation
LCO	Limiting Condition of Operations
NCR	Non-conformance Report
NCV	Non-Cited Violation
NSOC	Nuclear Safety Oversight Committee
ODCM	Offsite Dose Calculation Manual
PSRC	Plant Safety Review Committee
QASP	Quality Assurance SAFTOR Procedure
RMS	Radioactive Materials Shipment
SFP	Spent Fuel Pool
SAPN	Corrective Action Program Report
SSC	Structure, System or Component
STP	Surveillance Test Procedure
TS	Technical Specifications

ATTACHMENT 2

PARTIAL LIST OF DOCUMENTS REVIEWED

Audits and Appraisals

- EDMS # 062500018, HBPP Radiation Protection, Radioactive Materials Packaging and Transportation, and Radioactive Waste Processing and Process Control Program Audit report, performed October 10 through 20, 2006, report approved November 10, 2006.
- EDMS # 062550007, Humboldt Bay Power Plant Security Audit, performed November 28, 2006 through January 26, 2007, report approved February 9, 2007.

Corrective Action Program Documents (SAPN & Nonconformance Reports)

- Corrective Action Program Report SAPN 1215350, Evaluate valve gallery floor drain plugs.
- Corrective Action Program Report SAPN 1238495, Plugged Drain in Valve Gallery @ -14' EL.
- Corrective Action Program Report SAPN 1242745, Sealed Valves and Components.
- HBPP Nonconformance Report, NCR 06-04, Revision 1, STP Missed Extension Period.

Procedures

- Humboldt Bay Administrative Procedure (HBAP) A-1, HBPP Organization and Staff Qualifications," Appendix 6.4, Revision 25, effective September 7, 2006.
- Humboldt Bay Administrative Procedure, HBAP A-3, "HBPP Employee Check-In/Out Instructions and Responsibility and I/Q Use," Revision 10A, effective February 14, 2007.
- Humboldt Bay Administrative Procedure, HBAP C-1, "Design Changes," Revision 21, effective April 20, 2006.
- Humboldt Bay Administrative Procedure HBAP C-9, Sealed Components and Independent Verification, Revision 5A, effective March 15, 2007.
- Humboldt Bay Administrative Procedure HBAP C-9#1, Sealed Components Checklist and Log, Revision 33A, effective March 15, 2007.
- HBAP C-19, "Licensing Basis Impact Evaluation (LBIE)," Revision 21.
- Humboldt Bay Administrative Procedure, HBAP C-40, "Maintenance Program," Revision 17, effective February 8, 2007.
- Humboldt Bay Administrative Procedure, HBAP C-40 #1, "Maintenance Rule Compliance," Revision 4, effective January 11, 2007.

- Quality Assurance Plan, Revision 20, effective March 15, 2007.
- TQ1.NQ1, "Auditor Qualification and Certification," Revision 8, effective May 16, 2003.

Safety Screens

- RCP-6B, Release of Solid Material from the RCA, revision 4. Management Certified Fuel Handler concurrence on March 2, 2007.
- RCP-6F, Burial Site Disposal Criteria and Classification of Radwaste, revision 38. Management Certified Fuel Handler concurrence on October 27, 2006.
- RCP-6H, Receiving and Opening Radioactive Material Packages, revision 30. Management Certified Fuel Handler concurrence on March 7, 2007.
- RCP-6I, Collection, Labeling, Packaging, Storage and Accountability of Radioactive Material, revision 44. Management Certified Fuel Handler concurrence on October 27, 2006.
- RCP-6J, Radioactive Material/Waste Nuclide Fractions and Correlation Factor Determination, revision 36. Management Certified Fuel Handler concurrence on October 27, 2006.
- RCP-6L, Receiving, Loading and Releasing of Transport Vehicle for Radioactive Material/Waste Shipment, revision 9. Management Certified Fuel Handler concurrence on October 31, 2006.
- RCP-6P, Radioactive Material Shipments, revision 11. Management Certified Fuel Handler concurrence on October 30, 2006.

Data Sheets

- QRPs History Record, HBAP E-4, Attachment 8.1 for Procedure RCP-6B, Release of Solid Material from the RCA, revision 4. PSRC approval on March 9, 2007.
- QRPs History Record, HBAP E-4, Attachment 8.1 for Procedure RCP-6F, Burial Site Disposal Criteria and Classification of Radwaste, revision 38. PSRC approval on November 1, 2006.
- QRPs History Record, HBAP E-4, Attachment 8.1 for Procedure RCP-6H, Receiving and Opening Radioactive Material Packages, revision 30. PSRC approval on March 9, 2007.
- QRPs History Record, HBAP E-4, Attachment 8.1 for Procedure RCP-6I, Collection, Labeling, Packaging, Storage and Accountability of Radioactive Material, revision 44. PSRC approval on November 1, 2006.

- QRPs History Record, HBAP E-4, Attachment 8.1 for Procedure RCP-6J, Radioactive Material/Waste Nuclide Fractions and Correlation Factor Determination, revision 36. PSRC approval on November 16, 2006.
- QRPs History Record, HBAP E-4, Attachment 8.1 for Procedure RCP-6L, Receiving, Loading and Releasing of Transport Vehicle for Radioactive Material/Waste Shipment, revision 9. PSRC approval on November 1, 2006.
- QRPs History Record, HBAP E-4, Attachment 8.1 for Procedure RCP-6P, Radioactive Material Shipments, revision 11. PSRC approval on November 1, 2006.