



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

June 06, 2007

Mr. David Turner, Manager  
General Electric Company  
Vallecitos Nuclear Center  
6705 Vallecitos Road  
Sunol, California 94586

SUBJECT: NRC INSPECTION REPORT 070-00754/07-001

Dear Mr. Turner:

An NRC inspection was conducted on May 7-11, 2007, at your Vallecitos Nuclear Center site. This 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. The inspection included an examination of selected procedures and representative records, observations of activities, and interviews with personnel. The enclosed report presents the results of that inspection.

Based on the results of this inspection, the NRC has determined that a Severity Level IV violation of NRC requirements occurred involving failure to conduct adequate surveys to control contamination. This non-repetitive, licensee identified violation is being treated as a Non-Cited Violation (NCV), consistent with Section VI.A of the Enforcement Policy. This violation is described in Section 1.2 of the subject inspection report. If you contest the violation or significance 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 Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with copies to: (1) the Regional Administrator, Region IV; (2) the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Enclosure 2 contains sensitive, unclassified security information, and is therefore deemed Official Use Only and will not be placed in the Public Document Room nor the Publicly Available Records component of the NRC's Agency-wide Documents Access and Management System (ADAMS) document system.

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Should you have any questions concerning this inspection, please contact the undersigned at (817) 860-8191 or Emilio M. Garcia, Health Physicist, at (530) 756-3910.

Sincerely,

***/RA/***

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

Docket No.: 070-00754

License No.: SNM-960

Enclosures:

- 1) NRC Inspection Report 070-00754/07-001
- 2) Official Use Only-Security-Related Information

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cc w/enclosure 1: w/out enclosure 2:  
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**ENCLOSURE**

U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

Docket No.: 070-00754  
License No.: SNM-960  
Report No.: 070-00754/07-001  
Licensee: General Electric Company  
Facility: Vallecitos Nuclear Center (VNC)  
Location: Sunol, California  
Dates: May 7 through 11, 2007  
Inspector: Emilio M. Garcia, Health Physicist  
Fuel Cycle & Decommissioning Branch  
Approved By: D. Blair Spitzberg, Ph.D., Chief  
Fuel Cycle & Decommissioning Branch  
Attachment: Supplemental Inspection Information

## EXECUTIVE SUMMARY

Vallecitos Nuclear Center  
NRC Inspection Report 070-00754/07-001

This routine announced inspection included a review of radiation protection, management organization and controls, operator training/retraining, nuclear criticality safety, environmental protection, fire protection, and followup of previous inspection findings. A non-cited violation related to inadequate contamination surveys was identified.

### Radiation Protection

- A non-cited violation related to inadequate contamination surveys was identified. Other areas of the radiation protection program were in compliance with regulatory requirements and license conditions. Areas reviewed and found to be acceptable included audits and self assessments, the annual program review, leak tests of sealed sources, and area radiological surveys. Occupational exposures and airborne releases were below regulatory limits (Section 1).

### Management Organization and Controls

- The licensee continued to staff management level positions with individuals that met the academic training and experience specified in the license application. The Vallecitos Technological Safety Council continued to function as required by the license (Section 2).

### Operator Training/Retraining

- The licensee provided required criticality and radiation safety training during 2006 and in 2007 as of the time of inspection (Section 3).

### Nuclear Criticality Safety Program

- Radiological controls, house keeping and fire protection practices were being implemented in accordance with license requirements (Section 4).

### Environmental Protection

- The licensee had submitted their 2006 Annual Report for Effluent Monitoring and Environmental Surveillance Programs on a timely basis. All required samples had been collected, with no sample result exceeding any license or regulatory limit. No adverse trends or sample results were identified (Section 5).

## Fire Protection

- The licensee had established and maintained a fire protection program that included guidance and instructions for fire fighting, fire prevention, fire protection equipment, alarm systems, and emergency equipment. Fire protection equipment was maintained, and personnel were trained and drilled. The most recent survey by the licensee fire insurer had found the licensee's program conformed to applicable National Fire Protection Association guidelines (Section 6).

## Report Details

### Summary of Plant Status

During the inspection, activities in progress included research of unirradiated and irradiated uranium reactor fuel and irradiated hardware.

#### **1 Radiation Protection (83822)**

##### 1.1 Inspection Scope

The inspector reviewed the licensee's radiation protection program for compliance with the requirements of 10 CFR Part 20 and the license.

##### 1.2 Observations and Findings

The inspector reviewed recent audits, self assessment and similar evaluations of the radiation protection program performed in calendar year 2006 and in 2007 as of the time of the inspection. On March 21, 2007, the State of California performed an inspection of the licensee's cobalt-60 manufacturing license. A letter dated March 22, 2007, from the State of California Department of Health Services states that no items of noncompliance were identified.

During August 1 through 3, 2006, an Environmental Cross Business Audit was performed by General Electric staff who were not part of the Vallecitos Nuclear Center (VNC) organization. This audit included the subject area of Radiation Safety. This audit identified one regulatory and three non-regulatory findings. The regulatory finding related the commitment to conduct annual review of Radiation Safety standards. The licensee entered these findings into their corrective action program. The regulatory finding had been corrected by the time of this inspection.

The inspector reviewed four regulatory compliance reviews recently completed. These reviews were of Radiation Work Permits; Area Classification and Radiological Posting; Radiation Dosimetry and Bioassay Program; and Posting of Notices to Workers. All recommendations from these reviews had been added to the Licensee's Audit Tracking System (ATS).

The inspector reviewed of the licensee's exposure records for 2006 to ensure that no individual exceeded the regulatory limits specified in 10 CFR 20.1201. Exposure monitoring consisted of external and internal doses. Occupational doses included combined exposures obtained from radioactive materials licensed by both the NRC and the State of California, including the NRC's special nuclear materials (SNM) and test reactor licenses.

During 2006, 377 individuals were monitored for exposure of which 232 were site workers. All personnel exposures were below the regulatory limits specified in 10 CFR Part 20. The highest total effective dose equivalent exposure was 2.034 rems with a regulatory limit of 5 rems. The highest dose to the lens of the eye was 2.056 rems the regulatory limit of 15 rems. The highest dose to the skin of the whole body was 2.105 rems a regulatory limit of 50 rems. The highest extremity dose was 1.090 rems with a regulatory limit of 50 rems.

All doses were from external sources only. There were no assigned committed effective dose equivalent exposures during 2006. Based on whole body counting results, no radioactive material was detected in site personnel in quantities approaching the investigation levels.

During calendar year 2006 the licensee had no declared pregnant workers. As of May 9, 2007, the licensee had one declared pregnant worker. Regulation §20.1208 specifies an occupational dose equivalent limit of 0.5 rems to an embryo/fetus of a declared pregnant worker during the entire pregnancy. During the gestation period, the embryo/fetus received a dose below the detection level of the monitoring system which was 0.001 rems. The licensee has never had a planned special exposure.

The inspector reviewed the implementation of the licensee's As Low As Reasonably Achievable (ALARA) program, including the discussion documented in the Vallecitos Technical Safety Council meeting of April 25, 2007. The ALARA goals for 2006 were a total exposure goal for site workers of 18 person-rems, a maximum individual exposure of 1.8 rem and an average individual exposure of 0.100 rem. Actual exposures to site workers totaled 20.103 person-rems, maximum individual exposure of 2.034 rem and average individual exposure 0.087 rems. Two individuals exceed the ALARA goal of 1.8 rem. The bulk of the work that these individuals performed was related to the Cobalt-60, work performed under the licensee's California license. The licensee had initiated a focus review of dose to technicians working with cobalt-60 with a goal of reducing the individual doses. The ALARA goals for 2007 were 1.5 rem to the maximally exposed individual, and 19 person-rems for all site workers.

Annual radiation protection program reviews are required by §20.1101(c). The annual program review for 2006 was completed during the first quarter of 2006 and was submitted to the Vallecitos Technological Safety Council for review.

Airborne effluents were monitored for compliance with the Constraint Rule requirements of §20.1101(d). This regulation places a constraint on air emissions of radioactive material to the environment, excluding radon-222 and its progeny, such that the individual member of the public likely to receive the highest dose will not be expected to receive a total effective dose equivalent in excess of 10 millirems per year from these emissions. The COMPLY computer code version 1.6 was used to determine the dose at the site boundary from calendar year 2006 airborne effluents. The analysis reports were dated February 21, 2007. The licensee calculated the doses due to air emissions at two locations, the boundary of the industrial area and the site boundary. The industrial area calculated doses were 7.1 millirem effective dose equivalent and 0.2 millirem due to iodine. The site boundary calculated doses were 1.1 millirems effective dose equivalent and 0.022 millirem due to iodine. The calculation considered effluents from all four operating emission stacks.

License Condition S-3 requires that sealed plutonium sources be leak tested at 6-month intervals. The licensee possessed eight sealed plutonium sources. The inspectors confirmed that the sealed sources had been leak tested within the time interval specified in the license. The inspector reviewed records of smear surveys collected during April and October 2006 and April 2007. All samples were below the licensed limit of 0.005 microcuries of removable alpha contamination.

Procedures No. 3440, Area 100 Work Routines and 3500, MLO 100 Work Routines, specify the schedules for conducting routine radiation and contamination surveys. The inspector reviewed selected survey records to verify compliance with the licensee commitments for routine radiological surveys. Survey records maintained by the licensee indicated that routine surveys were performed on daily, weekly, biweekly, and monthly schedules. These surveys had identified a number of minor surface contaminations in Building 102 clean areas. None of these surface contaminations had resulted in personnel contamination. All individuals exiting these areas were monitored for contamination. Annual whole body counts had not identified any internal personnel contamination. Other than the September 2006 incident described below no significant contamination had been identified. Although no specific cause had been identified, the licensee believed that the source of the contamination was inadvertent transfer by personnel and equipment transiting from the contaminated to the clean areas of Building 102.

Section 8.1.1.3 of Appendix A states that air be sampled continuously in normally occupied areas in which dispersible SNM is handled. The samples shall be analyzed for gross alpha and gross beta-gamma. The inspectors reviewed procedures 4350, Flow Calibration of Air Samplers and procedure 4310, Air Sample Collection Responsibilities. During tours of the facility the inspectors observed several operating continuous air samplers in locations where workers could be present and dispersible SNM was handled. Records maintained by the licensee indicated that the sample filters were being exchanged and analyzed on a weekly basis, and the air flow was being calibrated semiannually.

The licensee had a program for the use of respiratory protection equipment. This program included medical evaluations, respirator fit testing and training. Records reviewed by the inspector indicated that all individuals authorized to use respiratory protection equipment were up to date on their medical, fit and training.

The inspector reviewed records of five incident investigations that had been documented in 2006. As of May 9, 2007, there had not been any incident in 2007, that had resulted in an incident investigation. The incident investigations had been conducted and documented per the requirements of Vallecitos Safety Standards No. 3.1, Investigation of Incidents. Investigations are characterized as Category 1 or 2. Category 1 investigations were nuclear or industrial occurrences requiring a report by government regulations or Company policy. Category 2 investigations were related to the operating reactor license at VNC and are responsive to the specific reporting requirements listed in the reactor licenses. These relate to equipment malfunction, and plant or equipment degradation. Category 1 was separated into either Type I or Type II investigations. Type 1 were incidents with consequences that include significant radiation exposure, contamination spread, property damage, or improper release of radioactive or hazardous material/waste into the environment. Type 2 were incidents for which the actual consequences were less serious but for which there was a potential for the occurrence of a Type I incident.

Three incidents were categorized according to the licensee's categorization criteria as Category 1 Type II, and two as Category 1 Type I. One of the Type 1 incidents involved a personnel injury that resulted in more than ten days away from work. The second incident was subject of a separate NRC inspection and involved sensitive, unclassified security information. None of the these incidents required formal NRC notifications.

As described in unresolved item 70-754/0603-03 in early September 2006, the licensee identified a contamination event, that included contaminated personal equipment and a desk. The licensee performed an incident investigation that was documented in incident investigation report 06-4, "Contamination of Cell 1 Gallery and Personnel Desk." The licensee had completed their review of this event and issued a report. This report noted a number of corrective actions that had been implemented. These corrective actions included: admonishing personnel of procedural requirements to (1) control contamination, (2) monitor for contamination, and (3) for area leaders to perform independent surveys. Additionally, food storage and consumption in the operating gallery was prohibited. The report had concluded that the major source of contamination were items in the desk drawers that had not been adequately surveyed. Failure to make or cause to be made, surveys that are reasonable under the circumstances to evaluate the potential radiological hazards is a violation of 10 CFR 20.1501(a)(2)(iii). This non-repetitive, licensee identified and corrected failure satisfies the criteria as a non-cited violation (NCV 070-00754/0701-01).

### 1.3 Conclusions

A non-cited violation related to inadequate contamination surveys was identified. Other areas of the radiation protection program were in compliance with regulatory requirements and license conditions. Areas reviewed and found to be acceptable included audits and self assessments, the annual program review, leak tests of sealed sources, and area radiological surveys. Occupational exposures and airborne releases were below regulatory limits.

## **2 Management Organization and Controls (IP 88005)**

### 2.1 Inspection Scope

The inspector reviewed recent changes in the management organization and records of the meetings of the Vallecitos Technological Safety Council (VTSC)

### 2.2 Observations and Findings

On June 26, 2006, the position of Manager, Regulatory Compliance and Environmental Health and Safety was filled by a new individual. Until this individual completed additional training, the responsibility for the Criticality Safety Function remained with the Manager, Facilities Maintenance. These organizational actions were reported to the NRC by letter dated June 26, 2006. The new Manager, Regulatory Compliance and Environmental Health and Safety met the qualification requirements of Section 4.3.2a of Appendix A to the license application.

On January 1, 2007, the Manager, Vallecitos Nuclear Center began reporting to the Manager General Electric Nuclear Energy Manufacturing. The Manager, Regulatory Compliance and Environmental Health and Safety continued to report to the Manager General Electric Nuclear Energy Environmental Health and Safety, but maintained day-to-day contact with the Manager, Vallecitos Nuclear Center.

On January 19, 2007, the licensee submitted a request to NRC for consent to transfer of control of licenses to GE-Hitachi Nuclear Energy America, LLC and approval of

conforming amendments. At the time of this inspection, this request was under review by the NRC.

No other significant managerial changes had occurred since this area was last inspected in April 2006.

Section 4.4 of Appendix A to the license application provides requirements for the Vallecitos Technological Safety Council. This Council is an independent review body and consists of at least five senior staff members. The Council is responsible for reviewing reportable incidents, the nuclear safety program, and major facility changes. The Council is required to meet quarterly. The inspector confirmed that the Council had met quarterly since the beginning of 2006 and that all meetings included a quorum of members. Minutes reviewed by the inspector documented that the council had performed the responsibilities designated in Section 4.4 of Appendix A to the license application.

### 2.3 Conclusions

The licensee continued to staff management level positions with individuals that met the academic training and experienced specified in their license application. The Vallecitos Technological Safety Council continued to function as required by the license.

## **3 Operator Training/Retraining (88010)**

### 3.1 Inspection Scope

The inspector reviewed the licensee's implementation of its required training program.

### 3.2 Observations and Findings

10 CFR 19.12 specifies the areas of instruction that occupationally exposed individuals must receive. Further, radiation safety training is required by Section 7.3 of Appendix A to the license application. This training is required for all new employees working in radiation areas or radioactive materials area. In addition, the licensee committed to provide refresher training annually. The licensee was implementing a GE Energy computer system to track training requirements and completion. This computer system was called Training Tracker. The inspector reviewed records maintained by the licensee and noted that the licensee was providing refresher training to their occupationally exposed individuals. The inspector noted that additional slides had been added to the Radiation Protection Fundamentals Refresher training that included all the topics listed in 10 CFR 19.12.

The inspector reviewed the training matrix and confirmed that all required radiological safety training, including refresher training, had been presented during 2006. The Radiation Protection Fundamentals Refresher training had been presented on January 31, 2007. A review of the records indicated that current staff members had attended the applicable training classes. The training included written examinations as appropriate.

Criticality safety training was required by Section 5.8 of Appendix A of the license application. The inspector confirmed that the licensee presented criticality safety training to applicable workers during 2006. This training included a written examination.

### 3.3 Conclusions

The licensee provided required criticality and radiation safety training during 2006 and in 2007 as of the time of inspection.

## 4.0 **Nuclear Criticality Safety Program (88020)**

### 4.1 Scope of Inspection

The inspector conducted tours of the site to review activities in progress and to determine whether risk-significant fissile material operations were being conducted safely and in accordance with regulatory requirements.

### 4.2 Observations and Findings

The inspector conducted tours of the gallery hot cells, the dry pit, the storage pool, the hillside storage and Building 103.

The inspector conducted independent radiological surveys using a Ludlum Model 2401-EC survey meter (NRC No. 21176G, calibration due date August 4, 2007). Radiological controls, including postings and barriers, were in place. Good housekeeping and fire protection practices were noted in all areas toured.

The licensee corrective actions related to previously identified violations in this inspection area contains sensitive unclassified security-related information, and is therefore deemed Official Use Only, and is described in Enclosure 2.

### 4.3 Conclusions

Radiological controls, housekeeping and fire protection practices were being implemented in accordance with license requirements.

## 5 **Environmental Protection (88045)**

### 5.1 Inspection Scope

The inspector reviewed the licensee's implementation of the environmental protection program to determine compliance with license and regulatory requirements.

### 5.2 Observations and Findings

The environmental monitoring program requirements are provided in Section 10 of Appendix A to the license application. The program consisted of gaseous effluent, liquid effluent, groundwater, stream bottom (sediment), and vegetation sampling. License Condition S-6 requires the licensee to provide a copy of the annual report to the NRC summarizing the effluent and environmental monitoring programs. The inspector reviewed the timely Annual Report 2006 for Effluent Monitoring and Environmental Surveillance Programs that was submitted on February 28, 2007.

The licensee conducted an analysis of the dose to potential members of the public from gaseous effluents using the COMPLY computer code. The results of the analysis reported that for calendar year 2006 the projected dose at the property line was 1.1 millirem per year from all emissions and 0.022 millirem per year from radioiodine. These exposures were below those stipulated in 10 CFR 20.1101(d) of 10 millirem per year for total effective dose equivalent.

The inspector noted that all required samples had been collected and no sample result exceeded any license or regulatory limits. No adverse trends or sample results were identified. The licensee concluded that based on the analytical results of radiological samples collected from locations on- and off-site during the reporting period, VNC was in compliance with all licenses issued by the U.S. Nuclear Regulatory Commission. The inspector agreed with this conclusion.

The licensee had four wells from which ground water samples were collected and analyzed on a quarterly basis. Samples from one well were analyzed for tritium. Monthly composite liquid effluent samples were also analyzed for tritium. These results were reported in the Annual Report 2006 for Effluent Monitoring and Environmental Surveillance Programs. The reported values for ground water ranged from 127 to 818 picoCuries per liter tritium and the composite liquid effluent values ranged from "not detected" to 907 picoCuries per liter tritium. These reported values were consistent with those reported for previous years and below the 10 CFR Part 20 of 1,000,000 picoCuries per liter tritium for effluent release limits and U. S. Environmental Protection Agency (USEPA) drinking water standard as listed in 40 CFR 141 of 20,000 picoCuries per liter tritium.

### 5.3 Conclusions

The licensee had submitted their 2006 Annual Report for Effluent Monitoring and Environmental Surveillance Programs on a timely basis. All required samples had been collected, with no sample result exceeding any license or regulatory limit. No adverse trends or sample results were identified.

## **6 Fire Protection (IP 88055)**

### 6.1 Inspection Scope

The inspector reviewed the licensee's fire protection program.

### 6.2 Observations and Findings

The licensee's fire protection program was included in the Site Emergency Procedures, in Procedure C-5, Fire Protection Plan. This procedure provided guidance and instructions for fire fighting, fire prevention, fire protection equipment, alarm systems, and emergency equipment for the VNC facilities. The licensee was no longer maintaining pre fire plans but was instead informing outside responders by annually providing copies of their Hazardous Materials Business Plan to the appropriate agency. The licensee had a designated fire Marshall and a nine person fire team lead by a fire chief and assistant fire chief. This team was intended to fight incipient-stage fires, but for larger fires, the assistance from off-site fire fighting agencies would be requested. The inspector reviewed records maintained by the licensee that indicated that training was being conducted on a quarterly basis, with the last training being conducted on

February 20, 2007. Representatives from the California Division of Forestry (CDF), the principal fire fighting agency for the site and Alameda County Fire Department, last toured VNC in the fall 2006.

The licensee maintained fire equipment that included automatic fire sprinklers, fire hydrants, sprinkler alarms, hose stations, a mobile equipment platform (MEP), portable fire extinguishers and self contained breathing apparatus (SCBA) . The licensee maintained a monthly inspection program to check the status of this equipment. The inspector observed the fire equipment during a tour of the site. The equipment observed appeared to be ready for use. The inspector reviewed selected records of these monthly inspections.

The most recent survey by the licensee fire insurer was conducted on January 18, 2007. This survey concluded that “fire equipment and alarm system records showed that these vital systems are being well maintained, and are tested at frequencies generally conforming to applicable National Fire Protection Association (NFPA) guidelines.” The survey noted that previous recommendations for changes had been completed. The surveyor made only one recommendation. This recommendation was to perform a thermographic (infrared) survey of electrical switchgear and equipment, 480-volts and above. The licensee was considering this recommendation but had not acted on it. The licensee concern was the value of a single survey versus the cost and benefit of conducting periodic thermographic surveys.

Fire drills were conducted annually and the last two were performed on May 30, 2006, and November 14, 2005.

### 6.3 Conclusions

The licensee had established and maintained a fire protection program that included guidance and instructions for fire fighting, fire prevention, fire protection equipment, alarm systems, and emergency equipment. Fire protection equipment was maintained, and personnel were trained and drilled. The most recent survey by the licensee fire insurer had found the licensee’s program conformed to applicable National Fire Protection Association guidelines.

## 7 **Followup (92701)**

### 7.1 (Closed) Unresolved 070-00754/0603-03: Regulatory issues related to the radiological contamination of surfaces and discreet items in the Building 102 operating cell gallery.

This unresolved item is discussed in Section 1 of this report. A non-cited violation related to inadequate contamination surveys was identified.

The licensee corrective actions related to previously identified violations contains sensitive unclassified security-related information, and is therefore deemed Official Use Only, and is described in Enclosure 2.

## 8 **Exit Meeting Summary**

The inspector presented the inspection results to the Manager, Vallecitos Nuclear Center and other members of licensee staff at the exit meeting on May 11, 2007. The licensee did not identify as proprietary any information provided to, or reviewed by, the inspector.

## ATTACHMENT

### **PARTIAL LIST OF PERSONS CONTACTED**

J. Ayala, Specialist, Radiation Monitoring  
C. Bassett, Manager, Facilities Maintenance  
R. Light, Specialist, Material Investigation  
L. Mahlahla, Manager, Regulatory Compliance and Environmental Health and Safety  
B. Neri, Principal Facilities Maintenance Technician (Fire Chief)  
M. Schrag, Manager, Engineering Material Services Operations  
H. Stuart, Specialist Radiological Engineer  
D. Turner, Manager, Vallecitos Nuclear Center

### **INSPECTION PROCEDURES USED**

IP 83822, Radiation Protection  
IP 88005, Management Organization and Controls  
IP 88020, Nuclear Criticality Safety  
IP 88045, Environmental Protection  
IP 88055, Fire Protection  
IP 92701, Followup

### **ITEMS OPENED, CLOSED OR DISCUSSED**

#### Opened

None.

#### Closed

70-754/0603-03	URI	Regulatory issues related to the radiological contamination of surfaces and discreet items in the Building 102 operating cell gallery.
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#### Discussed

None.

### **LIST OF ACRONYMS USED**

ADAMS	Agency-wide Documents Access and Management System
ALARA	As Low As Reasonably Achievable
ATS	Audit Tracking System
CDF	California Division of Forestry
CFR	Code of Federal Regulations
EMS	Engineering Material Services
GE	General Electric
MEP	Mobile Equipment Platform
NFPA	National Fire Protection Association
SCBA	Self Contained Breathing Apparatus
SNM	Special Nuclear Material

USEPA	U. S. Environmental Protection Agency
VNC	Vallecitos Nuclear Center
VTSC	Vallecitos Technological Safety Council

## **ATTACHMENT 2**

### **PARTIAL LIST OF DOCUMENTS REVIEWED**

#### **Procedures**

- GE Energy Vallecitos Nuclear Center Nuclear Site Emergency Procedure No. C-5, Fire Protection Procedure, revision 3, issued November, 2005.
- GE Energy Vallecitos Nuclear Center Nuclear Safety Procedures Procedure No. 3440, Area 100 Work Routines, Revision 8, issued October, 1998.
- GE Energy Vallecitos Nuclear Center Nuclear Safety Procedures Procedure No. 3500, MLO 100 Work Routines, Revision 9, issued August, 2006.
- GE Energy Vallecitos Nuclear Center Nuclear Safety Procedure No. 4310, Air Sample Collection Responsibility, Revision 6, issued May, 1999.
- GE Energy Vallecitos Nuclear Center Nuclear Safety Procedure No. 4350, Flow Calibration of Air Samplers, Revision 8, issued April, 2006.
- GE Energy Vallecitos Nuclear Center Nuclear Safety Procedure No. 4350, Flow Calibration of Air Samplers, Revision 9, issued May, 2007.
- GE Energy Vallecitos Nuclear Center Nuclear Safety Procedures Procedure No. 11125, Control and Transfer of Source and Special Nuclear Material, Revision 1, issued November 2006.
- GE Energy Vallecitos Nuclear Center Nuclear Safety Procedures Procedure No. 11125, Physical Inventory of Source and Special Nuclear Material, Revision 2, issued December 2006.
- GE Energy Vallecitos Nuclear Center Nuclear Vallecitos Safety Standards Standard No. 8.1, Radiological Training for VNC Employees, Revision 5, issued August, 1988.
- GE Nuclear Energy, Vallecitos and Morris Operations, EMS Document Number 60P063, Waste Evaporator Plant (WEP) Radwaste Liquid Requirements, Revision 0, February 8, 2005.
- GE Nuclear Energy, Vallecitos and Morris Operations, EMS Document Number 60P063, Waste Evaporator Plant (WEP) Radwaste Liquid Requirements, Revision 1, December 15, 2006.
- GE Nuclear Energy, Vallecitos and Morris Operations, EMS Document Number 60P063, Waste Evaporator Plant (WEP) Radwaste Liquid Requirements, Revision 2, January 15, 2007.

### Meeting Minutes

- January 30, 2006, VTSC Meeting Minutes - First Quarter, 2006.
- April 27, 2006, VTSC Meeting Minutes - Second Quarter, 2006.
- August 17, 2006, VTSC Meeting Minutes - Third Quarter, 2006.
- September 27, 2006, Radwaste/SNM Accountability Awareness Locator Training.
- October 26, 2006, VTSC Meeting Minutes - Fourth Quarter, 2006.
- November 2, 2006, Criticality Safety and SNM Accountability and Control Training
- January 24, 2007, VTSC Meeting Minutes - First Quarter, 2007.
- January 31, 2007, January Safety Training Record, Radiation Protection Refresher Training & Testing.
- April 25, 2007, VTSC Meeting Minutes - Second Quarter, 2007.

### Memorandums and Other Correspondences

- March 31, 2006, memorandum from Manager VNC to Area Managers, VTSC Members and Alternates, subject: ALARA goals for 2006.
- May 15, 2006, memorandum from Counting Laboratory VNC to Specialist, Radiation Monitoring, subject: VNC Sealed Source Smears - 2<sup>nd</sup> Quarter 2006.
- November 30, 2006, memorandum from Manager VNC to Area Managers, subject: Area Manager Responsibility.
- December 12, 2006, memorandum from Counting Laboratory VNC to Specialist, Radiation Monitoring, subject: VNC Sealed Source Smears - 4<sup>th</sup> Quarter 2006.
- February 23, 2007, memorandum from Manager Regulatory Compliance and Environmental Health and Safety to Manager Vallecitos Nuclear Center, subject: Summary of 2006 Safety Performance and Activities for General Electric Vallecitos Nuclear Center (VNC).
- March 22, 2007, letter from Inspection, Compliance and Enforcement Section - North, Radiological Health Branch, State of California Department of Health Services, to Manager, Vallecitos Nuclear Center, subject: California Radioactive Materials License Number 0017-01.
- April 17, 2007, memorandum from Counting Laboratory VNC to Specialist, Radiation Monitoring, subject: VNC Sealed Source Smears - 2<sup>nd</sup> Quarter 2007.
- February 28, 2007, Correspondence to the California Regional Water Quality Control Board, San Francisco Region, from the Manager Vallecitos Nuclear Center, subject

Annual Report 2006 for Effluent Monitoring and Environmental Surveillance Programs.

- March 26, 2007, memorandum from Manager VNC to Area Managers, VTSC Members and Alternates, subject: ALARA goals for 2007.

#### Data Sheets

- Printout of Fire Team members, dated May 8, 2007.
- Printout of 102B Building Emergency Team, dated May 8, 2007.
- Printout of 103 Building Emergency Team, dated May 8, 2007.
- Monthly Inspection of Fire Protection Equipment, completed March 16, 2007.
- Monthly Inspection of Fire Protection Equipment, completed February 26, 2007.
- Monthly Inspection of Fire Protection Equipment, completed January 24, 2007.
- Monthly Inspection of Fire Protection Equipment, completed December 20, 2006.
- Monthly Inspection of Fire Protection Equipment, completed November 14, 2006.
- Annual Fire Extinguisher Maintenance, completed June 30, 2006.
- Five Year Site Wide Fire System Inspection by a Licensed Contractor, completed September 23, 2004.
- Fire Team Training Record, for training conducted on February 20, 2007.
- Fire Team Training Record, for training conducted on December 8, 2006.
- Records of Fire Drill conducted on May 30, 2006.
- Landauer Annual 2006 ALARA Report of Account: 175017 Vallecitos Nuclear CTR.
- Procedure 4350 Air Sample Calibration Check Sheet, April 2006.
- Procedure 4350 Air Sample Calibration Check Sheet, October 2006.
- Procedure 4350 Air Sample Calibration Check Sheet, April 2007.

#### Audits and Assessments

- Global Asset Protection Services (GAPS), Loss Prevention Survey, GAPS ID: 108110/149638, GAPS Survey Number: 155348, performed on January 18, 2007.
- December 13, 2006, memorandum from Specialist Radiological Engineer - Regulatory Compliance to Area Managers, subject: Regulatory Compliance Review - Radiation Work Permits.

- February 3, 2007, memorandum from Manager, Regulatory Compliance and Environmental Health and Safety to Area Managers, subject: Area Classification/Radiological Posting Audit (2006 Audit).
- February 6, 2007, memorandum from Specialist Radiological Engineer - Regulatory Compliance to Area Managers, subject: Regulatory Compliance Review - Radiation Dosimetry and Bioassay Program.
- March 30, 2007, memorandum from Specialist Radiation Monitor - Regulatory Compliance to Area Managers, subject: Regulatory Compliance Review - Posting of Notices to Workers.
- GENE Vallecitos, Aug 1-3, EHS Cross Business Audit Report.
- Audit Tracking System finding ID: 451: A medical determination and approval was given for an individual to wear a respirator based solely on the individual's medical evaluation questionnaire.
- Audit Tracking System finding ID: 452: Annual radiation standard reviews have not been conducted as required. (35 of 52 not current). Also persons not in the radiation safety component conducted 5 reviews.
- Audit Tracking System finding ID: 453: Portable radiation instrument calibrations records do not show the day the calibration was performed (only the fiscal year and fiscal week).
- Audit Tracking System finding ID: 498: Corrective Action 2a: Review this issue with the Area Managers to reinforce expectations for oversight and control of activities in their areas of responsibility.
- Audit Tracking System finding ID: 535: Site has only one dedicated employee to handle waste shipments.