NRC/PG&E MEETING
OCTOBER 23, 2007

HUMBOLDT BAY POWER PLANT

DECOMMISSIONING PLANS, SCHEDULE AND ISSUES

Pacific Gas and Electric Company®

PURPOSE and AGENDA

- PSDAR, Rev. 1, August 2007
- Transfer of Spent Fuel to ISFSI
  - Submittals Needing NRC Approval
  - Fuel Size Criteria
- Humboldt Bay Repowering Project (HBRP)
  - Cross Contamination Prevention and Monitoring Plan
  - Schedule for Near-term Surveys
  - Impact on Decommissioning Units 1, 2 and 3

PSDAR

- Rev. 0 Submitted February 27, 1998
  - Ventilation Stack Demolition
  - Feasibility of Licensing an ISFSI
- Rev. 1 Submitted August 31, 2007
  - ISFSI Construction
  - Transfer Spent Fuel from Pool to ISFSI
  - Interim Unit 3 Decommissioning
  - Construct and Operate HBRP
  - Decommission Units 1 and 2
  - Complete Unit 3 Decommissioning

SPENT FUEL TRANSFER TO ISFSI

- Nuclear Unit 3
  - Equipment/Pathway Clearance
  - Pool Cleanup
  - Davit Crane Testing December 2007
- ISFSI
  - Vault Constructed Summer 2007
  - Dry Runs January - February 2008
  - Fuel Loading March – June 2008

SUBMITTALS NEEDING NRC APPROVAL

- HBPP Submittals in November Requesting Six Month NRC Review and Approval
  - Security Exemption and LAR
  - Tech Spec LAR
  - 10 CFR 20, App. B, Table 1 Exemption
  - Emergency Plan Reduction in Effectiveness

FUEL SIZE CRITERIA

- Pool Cleanup Phase (2003 - Present)
  - Fuel Fragments Discovered
  - Needed to Correct SNM Inventory Inaccuracy
    - Needed to Define Fuel Size
    - ANSI N15.8-1974 Defines Fuel Element
      - Smallest Part of Fuel Assembly is Fuel Rod or Pin
  - PG&E Defined Minimum Fuel Size as ¼-inch
    - Smallest Practical Fuel Size is ¼-inch
    - Fuel Size Definition Documented in PG&E SNM Final Report and NRC Inspection Report

FUEL SIZE CRITERIA (Cont'd)

- Post-ISFSI Loading Phase (Starts Mid-2008)
  - ISFSI Not Easily Available for SNM Storage
  - Need to Address Possibility of Finding SNM
    - Need to Define Fuel Size
    - Draft ANS Standard Defines Fuel Component
      - Smallest Part of Fuel Assembly is Rod for Intact Components; or Rod Fragments or Pellets if Structural Integrity is Not Maintained
      - Smallest Part of Fuel is Pellet (Fragment is Larger)
  - PG&E to Define Minimum Fuel Size as Pellet
    - Smallest Practical Fuel Size is Pellet
    - Consistent with Draft ANS Standard

HUMBOLDT BAY REPOWERING PROJECT

- Humboldt Bay Repowering Project (HBRP)
  - Construction Permit from California Energy Commission Expected March 2008
  - Construction Begins Mid 2008
  - Cross Contamination Prevention and Monitoring Plan Completed Prior to Surveys
  - Near-term Surveys Mid 2008 (ORISE Onsite)
  - Operational Late 2009
  - Decommission Units 1 and 2 Before Unit 3
  - If HBRP is Delayed, Schedule May Be Changed

SECURITY EXEMPTION REQUEST AND LAR

- After Fuel Removed from SFP
  - 10 CFR 73 No Longer Needed for Unit 3
  - NRC Orders (ICMs, FFD) No Longer Applicable
  - Exemption to 50.54(p), Part 73 and Orders
  - Delete License Condition for Security Plan
  - Similar to Rancho Seco Request
- ISFSI Security Implemented Per 10 CFR 72
- Submit in November
  - Request NRC Approval in 6 Months
  - Effective After Spent Fuel is in ISFSI

TECH SPEC LAR

- Delete Operational and Administrative Requirements for Spent Fuel in Pool
- Relocate Administrative Controls to QA Plan
- Delete LCOs for SFP Level and Heavy Loads
- Maintain LCO for SFP Liner Gap Level with Pool Contaminated with Rad Material
- Similar to Rancho Seco, Yankee Rowe, Dresden
- Submit in November
  - Request NRC Approval in 6 Months
  - Effective After Spent Fuel is in ISFSI

10 CFR 20 APP. B, TABLE 1 EXEMPTION REQUEST

- Annual Limits on Intake (ALI) and Derived Air Concentrations (DAC) Values
- Current Appendix B, Table 1 Values Based on 1977 International Commission on Radiological Protection (ICRP) Recommendations
- HBPP Proposes to use DAC and ALI Values Based on 1995 ICRP Recommendations
- Submit in November
  - Request NRC Approval in 6 Months
  - Effective Upon NRC Approval

EMERGENCY PLAN REDUCTION IN EFFECTIVENESS

- Reduce Onsite Staffing to 1 Person Plus Security
- Consistent With Reduced Risk
- Similar to Rancho Seco, Conn. Yankee
- Submit in November; Request Approval in 6 Months
- Effective After Spent Fuel is in ISFSI