



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

December 28, 2007

Mr. David Turner, Manager
Vallecitos Nuclear Center
GE-Hitachi Nuclear Energy Americas, LLC
6705 Vallecitos Road
Sunol, California 94586

SUBJECT: NRC INSPECTION REPORT 050-00018/07-004

Dear Mr. Turner:

This refers to the inspection conducted on November 26 through 30, 2007, of the General Electric (GE) Vallecitos Boiling Water Reactor (VBWR) in Sunol, California. The inspection was an examination of decommissioning 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 discussions with your staff and examination of selected procedures related to the planned removal of equipment and components from the GE VBWR. Details of the inspection were presented to your staff at the conclusion of the onsite inspection. The enclosed report presents the results of that inspection. No violations were identified, and no response to this letter is required.

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) 860-8197 or Mr. Emilio M. Garcia, Health Physicist, at (530) 756-3910.

Sincerely,

/RA/

Jack E. Whitten, Chief
Nuclear Materials Safety Branch B

Docket No.: 050-00018
License No.: DPR-1

Enclosure: NRC Inspection Report No. 050-00018/07-004
(w/Attachments 1&2)

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SUNSI Review Completed: EMG ADAMS: Yes No Initials: EMG

Publicly Available Non-Publicly Available Sensitive Non-Sensitive

DOCUMENT NAME: S:\DNMS\Fcdb\EMG\GEVBWR0704.wpd

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U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket Nos.: 050-00018
License Nos.: DPR-1
Report No.: 050-00018/07-004
Licensee: GE-Hitachi Nuclear Energy Americas, LLC
Facility: General Electric Vallecitos Boiling Water Reactor
Location: 6705 Vallecitos Road
Sunol, California 94586
Dates: November 26 through 30, 2007
Inspector: Emilio M. Garcia, Health Physicist
Approved By: Jack E. Whitten, Chief
Nuclear Materials Safety Branch B
Attachments: Supplemental Information
Partial List of Documents Reviewed
Attachment: Supplemental Inspection Information

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EXECUTIVE SUMMARY

GE-Hitachi Vallecitos Nuclear Center
NRC Inspection Report No. 050-00018/07-004

This inspection was a routine, announced inspection of activities being conducted at the General Electric (GE) Vallecitos Boiling Water Reactor (VBWR) during the removal of equipment and components from the reactor building. The inspection included tours of the reactor site, a review of applicable records, observations of activities, and interviews with both the licensee's and contractor's personnel.

Organization, Management, and Cost Controls (IP 36801)

- The licensee had in place a program for employees to identify safety concerns. Personnel interviewed by the inspector had received training on this topic and indicated that they were comfortable in raising safety concerns (Section 1).

Decommissioning Status (IP 71801)

- The licensee had approved ten Change Authorizations (CA) and the eight procedures for the equipment removal project at the VBWR. The project contractor had initiated removal of contaminated equipment and components from the VBWR. This project of removing contaminated equipment and components from the reactor building was projected by the licensee for completion by the end of June 2008 (Section 2).

Occupational Radiation Exposure (IP 83750)

- Two issues were discussed with the licensee that related to acceptance of outside calibration services by the licensee and the documentation of individuals who were qualified to conduct radiation surveys of materials for unrestricted use. These concerns were immediately addressed by the licensee or entered into the licensee's tracking system for resolution (Section 3).

Solid Radioactive Waste Management and Transportation of Radioactive Materials (IP 86750)

- Changes to the licensee's organization, personnel, facilities, equipment, programs, and procedures had not negatively affected the solid waste management and transportation of radioactive materials' program (Section 4.1).
- Personnel involved in the transfer, packaging and transport of radioactive waste and transportation of other radioactive materials had received required training (Section 4.2).
- The licensee maintained copies of the applicable regulations and the licenses of the recipients of radioactive materials (Section 4.3).

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- The licensee had implemented a transportation program for radioactive materials in accordance with NRC and the U.S. Department of Transportation regulations (Section 4.4).

Report Details

Summary of Plant Status

The GE VBWR achieved full power operations at 50 Mw(t) in 1957 and was permanently shut down in 1963.

At the time of this inspection, the reactor fuel had been permanently removed from the reactor and shipped from the site. The VBWR license authorized the possession of the associated reactor equipment and components and the related byproduct material. The reactor at the time of this inspection was in SAFSTOR, a decommissioning alternative which authorizes a licensee to safely store the reactor and related byproduct material for an extended period of time, pending final decommissioning. The primary reason GE had placed the reactor in SAFSTOR was to allow for the decay of cobalt-60 which in turn would reduce radiation exposures to occupational workers during future decommissioning activities.

The VBWR license has no expiration date. The licensee does not intend to decommission the reactor in the near future, but intends only to remove components and equipment as permitted under the current license. License Condition 5.a to Amendment 21 of the license authorizes the licensee to dispose of any component parts or devices from the facility in accordance with the provisions of 10 CFR Part 20. The licensee in preparation of activities for removing components and equipment from the reactor building had procured the services of a contractor, Nuclear Fuel Services (NFS). As the primary contractor, it is the responsibility of NFS to manage, supervise, assure health and safety on the project, and to conduct the removal of components from the VBWR. This specific project was referred to by the licensee as NFS Liability Reduction Project or just the NFS Project. This inspection reviewed the progress being made by the licensee on this project of removing components and equipment from the reactor building. This effort by NFS did not involve or include the removal of the reactor vessel. The licensee, when question about the project schedule, projected that the work of removing equipment and components would be completed by the end of June 2008.

1 Organization, Management, and Cost Controls (IP 36801)

1.1 Inspection Scope

The inspector reviewed the methods used by the licensee to resolve employee nuclear safety concerns and to provide employees information regarding their rights to raise safety concerns.

1.2 Observations and Findings

Personnel employed at the site, both direct hires and contractors, were provided training by the licensee on reporting nuclear safety concerns as part of the periodic safety meetings. The inspector interviewed five contractor employees to determine the type of training they had received on methods for addressing nuclear safety concerns. All five contractor employees indicated that they had received training on raising safety

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concerns. When individuals were quizzed as to how they would raise a nuclear safety concern, all indicated that they would first attempt to resolve the matter through their chain of command. These individuals, when questioned about raising safety concerns, indicated to the inspector that they felt comfortable bringing this type of concerns to their supervisors. None of the contractor employees volunteered that they could also bring the safety issue the attention of GE-Hitachi personnel. Two contractor employees did indicate that they could bring nuclear safety concerns to GE-Hitachi when they were specifically asked about forwarding nuclear safety concerns to GE-Hitachi for resolution. When the inspector brought this item to the attention of the NFS Project Manager, he stated that he would issue a Read-and-Heed memorandum to all his staff reminding them that they could raise nuclear safety concerns directly to GE-Hitachi.

The licensee used their Environmental Health and Safety Concern Reporting System to track nuclear safety concerns received and to document their resolution. The inspector queried the system and noted that nuclear safety concerns that were received by GE-Hitachi and had been entered into this system for resolution.

1.3 Conclusion

The licensee had a program for employees to identify safety concerns. Personnel who were interviewed by the inspector had received training on this topic and indicated that they were comfortable in raising any nuclear safety concerns.

2 Decommissioning Status (IP 71801)

2.1 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.

2.2 Observations and Findings

The NFS Project had developed a Component Removal Project Plan (CRMP). The inspector confirmed that activities outlined in the CRMP would be conducted under the existing reactor license. Administrative control of the project included the use of CAs, project specific procedures, and a project schedule. The CAs were used by the GE-Hitachi Vallecitos Nuclear Center (VNC) as an administrative mechanism to describe and approve safety-related changes to systems and processes. The inspector determined the licensee had authorized ten CAs:

1. CA-07-25, Personnel Access Control via Equipment Access Hatch
2. CA-07-26, Calibration of PCM instrument w/ Cs-137 source
3. CA-07-28, Installation of Jib Crane South of VBWR Equip Access
4. CA-07-30, VBWR Component Removal
5. CA-07-31, VBWR Effluent Monitoring

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6. CA-07-32, VBWR Polar Crane Certification
7. CA-07-34, Vendor Calibration of MPG Alarming Dosimeters
8. CA-07-35, Boring Holes in VBWR floor
9. CA-07-36, VBWR Electrical Isolation
10. CA-07-38, VBWR Containment Modification at Equipment Access

The inspector determined that eight project specific procedures had been approved by GE-Hitachi Vallecitos Regulatory Compliance and Area Managers:

1. NFS-VNC-ADM-9101, Liability Reduction Project Conduct of Operations
2. NFS-VNC-OPS-9201, Work Plans
3. NFS-VNC-OPS-9202, LSA Waste Shipping
4. NFS-VNC-OPS-9203, Packaging and Labeling of Radioactive Materials
5. NFS-VNC-OPS-9204, VBWR Air Sampling
6. NFS-VNC-OPS-9205, Personnel Exposure and VBWR Access Control
7. NFS-VNC-OPS-9207, Radiological Characterization
8. NFS-VNC-INST-9401, Off Site Calibration of Radiation Protection Instruments

The schedule maintained by the licensee at the time of the inspection projected that the removal project would be completed by the end of June 2008. At the time of the inspection, total work force for the project, including project management and supervision, was 15 individuals, with an additional laborer position pending selection.

The inspector conducted tours of the VBWR building and in areas where the shipping packages used by GE-Hitachi were stored, observed work in progress, interviewed personnel, and conducted independent radiation surveys. The work-in-progress activities observed by the inspector during the tours were conducted in a safe and orderly manner. The inspector conducted independent radiological surveys using a Ludlum Model 2401-EC survey meter (NRC No. 21175G, calibration due date July 10, 2008). Radiological controls, including postings and barriers, were observed by the inspector to be in place. Good housekeeping and fire protection practices had been implemented in the areas toured by the inspector.

At the time of the inspection, the equipment hatch had been removed and a roll-up door installed in its place, the jib crane had been installed, and the steam generator had been removed from the building.

2.3 Conclusion

The licensee had approved ten CAs and eight procedures for the equipment removal project at the VBWR. The licensee's contractor had initiated removal of contaminated components from the VBWR. This removal project was projected by the licensee to be completed by the end of June 2008.

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3 Occupational Radiation Exposure (IP 83750)

3.1 Inspection Scope

The inspector reviewed the implementation of the radiation protection program as it relates to the VBWR components removal project.

3.2 Observations and Findings

The inspector reviewed the licensee's annual regulatory compliance review for the VBWR for 2006 and a contractor safety observation conducted by GE-Hitachi. The latter observation was conducted by the licensee on November 1, 2007, after the NFS Project had started. Neither, the licensee's annual regulatory compliance review, nor the safety observation performed by the licensee, identified any problems related to radiation safety activities. The safety observation identified four items requiring attention. The inspector confirmed that all four of these observations had been added to the licensee's audit tracking system for resolution.

NFS Project procedure NFS-VNC-INST-9401, Off-Site Calibration of Radiation Protection Instruments, had been developed and implemented by the licensee to permit the calibration of survey instruments by off-site vendors. Vendors were determined by the licensee to be acceptable as long as they met certain quality standards and had received prior approval by the GE-Hitachi VNC Manager of Regulatory Compliance. This procedure after a technical and administrative review had been approved by the GE-Hitachi VNC management. At the time of this inspection approval of calibrations by two off-site vendors was under review by the GE-Hitachi VNC Manager of Regulatory Compliance.

On November 26, 2007, the inspector determined that the NFS Project contractor owned or leased 11 portable radiation survey instruments. Records maintained by that contractor documented that all but two of the instruments used by the contractor had been calibrated by one outside vendor, CTI Calibration Technologies a subsidiary of Radiation Safety and Controls Services, Inc. These portable radiation survey instruments were observed by the inspector as having been calibrated on September 14, 2007, or later. One instrument, a Ludlum 2929, was observed by the inspector to have been calibrated on April 17, 2007, by the vendor from whom it was leased. The inspector noted that one instrument, a Ludlum Model 2200, was not currently calibrated; However, this instrument was determined by the inspector as not being operational. The NFS Project Manager stated to the inspector that since he was purchasing used portable radiation survey instruments for the NFS project, he had requested that they be calibrated before being delivered. He explained to the inspector that this was his method of assuring that any instruments purchased were operational.

The inspector interviewed two senior radiation protection technicians and the Health and Safety Coordinator associated with the NFS Project. One of the senior radiation protection technicians, when questioned about his use of portable survey instruments,

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stated that he had never used any of the instruments purchased for the NFS Project for any surveys he had conducted. The other senior radiation protection technician acknowledged that on rare occasions he had used a survey instrument purchased for the NFS Project for operational surveys when GE-Hitachi instruments were not available for use. Operational surveys are the radiation surveys performed by technicians that are intended to determine the presence of radioactivity but are not routinely documented. An example of a radiation survey not routinely documented includes the technician checking a muslin for contamination after the muslin was used to wipe a surface to determine if contamination exists. The Health and Safety Coordinator for the NFS Project when questioned by the inspector acknowledged making a request that NFS project instruments be used for only "go or no-go" surveys and only when GE-Hitachi instruments were not available. Although these NFS Project instruments were currently calibrated the calibration vendor had not been accepted by GE-Hitachi, and the decision to accept these instrument calibrations by the vendor was under review at the time of this inspection.

The inspector interviewed NFS Project radiation protection staff about which survey instruments were used to conduct documented radiation surveys. In response to this question, they stated it was customary to use GE-Hitachi radiation survey instruments. The radiation protection staff indicated that at no time had a NFS Project instrument been used for conducting a survey that is required to be documented. The inspector reviewed records of radiological surveys performed from September 2, 2007, to November 27, 2007. Of the records reviewed by the inspector, none of the records listed a NFS Project instrument as being used to conduct radiation surveys.

The inspector concluded that the radiation survey instruments that were used by the contractor were currently calibrated and the instruments purchased for use by the NFS Project were not used to conduct documented surveys. These NFS Project instruments were used on rare occasions when GE-Hitachi instruments were not available for "go or no-go" surveys. These NFS Project instruments were never used for conducting radiation surveys that were required to be documented.

The inspector reviewed activities conducted under the licensee's Nuclear Safety Procedure Number 3355, Radiological Surveys - Unrestricted Use, which states in part in Step IV. G that "Only designated Regulatory Compliance personnel may perform surveys for unrestricted use unless prior arrangements between the applicable Area Manager(s) and Regulatory Compliance have been documented."

The Manager Regulatory Compliance and Environmental Health and Safety, stated that this procedural requirement that established which personnel may perform release survey had been established by GE-Hitachi to limit potential liabilities. Therefore, it was GE-Hitachi's intentions to use only highly trusted personnel to release materials and equipment for unrestricted use, and thus reduce the likelihood of materials and equipment components that were contaminated from being released. However, the Manager Regulatory Compliance and Environmental Health and Safety stated that it was GE-Hitachi's intentions that any qualified health physics technician, whether a

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GE-Hitachi employee or a contractor's employee, be able to perform an unrestricted use surveys. She also stated that she recognized that some contract technicians could have more experience in conducting unrestricted use surveys than Regulatory Compliance personnel.

The inspector determined that the Health and Safety Coordinator employed by the NFS Project was previously employed by GE-Hitachi Vallecitos Regulatory Compliance as a health physics technician. The licensee through its review process had determined that the Health and Safety Coordinator for the NFS Project was both qualified and designated to perform surveys of materials and equipment prior to its release for unrestricted use. According to the Manager Regulatory Compliance and Environmental Health and Safety, she had discussed with the NFS Project Manager at an earlier date her assessment of the qualifications of the Health and Safety Coordinator for the NFS Project and at that time had provided her determination that this individual was designated to perform unrestricted use surveys. However, she had failed to document her assessment of this individual's authorization to conduct unrestricted surveys until late November 2007. The inspector noted that the written assessment had been documented in a November 27, 2007, electronic message (e-mail) from the Manager Regulatory Compliance and Environmental Health and Safety to the applicable Area Manager and to the NFS Project Manager.

The inspector reviewed the technical experience and qualifications of other radiation protection (health physics) technicians. All individuals whose qualifications were reviewed had years of experience as senior health physics technicians and had been qualified by GE-Hitachi as radiation monitoring technicians.

The inspector reviewed 41 records of radiation surveys of materials and equipment released for unrestricted use in 2007. In reviewing the records of these unrestricted release radiation surveys, the inspector noted that 29 of these radiation surveys had been conducted by the NFS Project Health and Safety Coordinator. Further review indicated that 11 radiation surveys listed both the NFS Project Health and Safety Coordinator and a NFS Project Radiation Monitoring Technician as having performed the specific survey. The inspector interviewed the two radiation monitoring technicians that were listed as performing the surveys and who were still employed onsite. Both individuals stated that all radiation surveys where their name was listed on the unrestricted release survey record had been performed in the presence of the NFS Project Health and Safety Coordinator or the coordinator had independently verified the survey results recorded by each technician.

The Manager Regulatory Compliance and Environmental Health and Safety stated that GE-Hitachi would review Procedure Number 3355 to clarify and expand the procedure. This modification to the procedure would specifically denote that all qualified radiation monitoring technicians may perform surveys of material for release for unrestricted use.

The inspector concluded that the authorization of the NFS Project Health and Safety Coordinator to perform release surveys of material and equipment for unrestricted use

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had not been promptly documented. This oversight by the Manager Regulatory Compliance and Environmental Health and Safety to document her discussion was based on her assessment that the individual involved had been previously qualified and approved by GE-Hitachi to conduct unrestricted use surveys and consequently would be approved to conduct unrestricted release surveys in the new position.

3.3 Conclusion

Two items were discussed with the licensee. One item was related to acceptance of outside calibration services for calibrating portable radiation survey instruments and the second item related to the licensee having available complete documentation of all individuals who were qualified to conduct radiation surveys of materials for unrestricted use. Both of these administrative items were discussed with the licensee and were either corrected immediately or entered in the licensee's tracking system to be addressed by the licensee.

4 **Solid Radioactive Waste Management and Transportation of Radioactive Materials (IP 86750)**

4.1 Changes in the programs

a. Inspection Scope

The inspector interviewed cognizant personnel and review selected documents. These actions were conducted by the inspector to determine if any major changes were made by the licensee since the last inspection in organization, personnel, facilities, equipment, programs, and procedures that may have affected the solid radioactive waste management and transportation of radioactive materials' program maintained by the licensee.

b. Observations and Findings

In support of the NFS Project the licensee employs a Shipping and Technical Support Coordinator. The inspector determined through interviews and review of documentation that this individual had many years of experience in overseeing solid radioactive waste management and transportation of radioactive materials' programs. In reviewing documents, the inspector noted that two NFS Project procedures related to solid radioactive waste management and transportation of radioactive materials' had been developed and implemented by the licensee, NFS-VNC-OPS-9202, LSA Waste Shipping, and NFS-VNC-OPS-9203, Packaging and Labeling of Radioactive Material and training in these topics had been provided to the requisite personnel. No other changes on the solid waste management and transportation of radioactive materials' program had occurred since the last inspection.

c. Conclusions

Changes to the licensee's organization, personnel, facilities, equipment, programs, and procedures had not negatively effected the solid waste management and transportation of radioactive materials' program.

4.2 Training

a. Inspection Scope

The inspector interviewed cognizant personnel and review selected documents. These actions were completed to determine if all personnel involved in the transfer, packaging and transport of radioactive waste and transportation of other radioactive materials had received required training. Items reviewed by the inspector included the initial training and periodic retraining in the US Department of Transportation (DOT) regulations, training in NRC regulations and the waste burial license requirements, instructions in the transfer, packaging and transport of radioactive waste and transportation of other radioactive materials, and the licensee's operating procedures.

b. Observations and Findings

The inspector determined that NFS Project staff had been provided training on the solid radioactive waste management and transportation of radioactive materials. In addition, these individuals had completed the annual radwaste training presented by GE-Hitachi VNC. DOT HAZMAT Transportation Security General Awareness training was completed by all individuals, with the exception of one radiation protection technician who had been recently assigned to the project. This HAZMAT training was provided by the licensee to all workers involved in the transfer, packaging and transport of radioactive materials. The inspector determined that each individual involved in the transfer, packaging, and transport of radioactive material had received the required initial training and retraining. The licensee informed the inspector that the required job specific training for the new radiation protection technician was expected to be completed within 90 days of his initial assignment.

c. Conclusions

Personnel involved in the transfer, packaging and transport of radioactive waste and transportation of other radioactive materials had received required training.

4.3 Implementation of the Solid Radioactive Waste Program

a. Inspection Scope

The inspector interviewed cognizant personnel and review selected documents to determine if the licensee maintained copies of the applicable regulations and licenses of recipients of radioactive materials shipped from the site.

b. Observations and Findings

The inspector determined that NFS Project management had access to electronic copies of NRC, DOT, and the waste disposal vendor's State of Utah radioactive materials license. Additionally, the inspector confirmed that the licensee had maintained copies of the licenses for the recipients of all radioactive materials that had been shipped from the VBWR. The NFS Project management also maintained a copy of the State of Utah land disposal facility access permit.

c. Conclusions

The licensee maintained copies of the applicable regulations and the licenses of the recipients of radioactive materials.

4.4 Shipping of Low Level Radioactive Waste for Disposal, and Transportation of Other Radioactive Materials

a. Inspection Scope

The inspector observed specific portions of radioactive waste shipments being made at the time of this inspection. The inspector reviewed records maintained by the licensee of radioactive materials' shipments made since the last inspection.

b. Observations and Findings

On November 27 and 28, 2007, the inspector observed the repackaging of two C-Vans to determine if the licensee had used proper blocking and bracing techniques inside the transportation packages. No blocking and bracing discrepancies were observed by the inspector in the repackaging activities.

As of November 29, 2007, seven shipments of radioactive materials had been made in 2007 from the VBWR. The inspector reviewed records for shipments, GE-07-40-01, GE-07-41-01, GE-07-42-01, GE-07-43-01, GE-07-44-01, GE-07-44-02, and GE-07-44-03. All of the shipping records reviewed by the inspector included a copy of required radiological surveys conducted by the licensee, NRC Form 540, Uniform Low-Level Radioactive Waste Manifest, emergency response information, and instructions to the carrier for maintenance of exclusive use shipment controls. The inspector confirmed that the emergency response number listed on the waste manifest was the telephone number for the licensee's security station. Documents that required shipper certifications were reviewed by the inspector who confirmed that all documents had been signed by an authorized licensee representative. The inspector also substantiated that all individuals signing shipper certifications for the above shipments had received the appropriate training as required by 49 CFR 172, Subpart H.

The Principal Engineer (Radioactive Waste) stated that the licensee had not received any notices of noncompliance from DOT or other competent State authorities.

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c. Conclusions

The licensee had implemented a transportation program for radioactive materials in accordance with NRC and the U.S. DOT regulations.

5 Exit Meeting Summary

The inspector presented the inspection results to members of licensee management at the exit meeting on November 30, 2007.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

C. Bassett, Manager, Facilities Maintenance and Quality Assurance
R. Lillge, Manager, Liability Reduction
S. Murray, Manager, Licensing and Liabilities
L. Martin, Manager, Regulatory Compliance and Environmental Health & Safety
C. Martinez, Principal Engineer (Radioactive Waste)
H. Stuart, Specialist, Radiological Engineering
D. Turner, Manager, Vallecitos Nuclear Center

Nuclear Fuel Services - Contractor

S. Alvares, Laborer Supervisor
M. Arnerich, Project Health and Safety Coordinator
G. Astrauckas, Project Manager
D. Ball, Project Operations Leader
J. Enabenter, Project Radiation Monitoring Technician
S. Finchum, Project Radiation Monitoring Technician
D. Jordan, Project Shipping and Technical Specialist
Henry Oldham, Project Manager - GE-Hitachi Projects

INSPECTION PROCEDURE USED

IP 36801	Organization, Management, and Cost Controls
IP 71801	Decommissioning Status
IP 83750	Occupational Radiation Exposure
IP 86750	Solid Radioactive Waste Management and Transportation of Radioactive Materials

ITEMS OPENED AND CLOSED

Opened

None

Closed

None

Discussed

None

LIST OF ACRONYMS

CA	Change Authorization
CRMP	Component Removal Project Plan
DOT	U. S. Department of Transportation
GE-Hitachi	General Electric-Hitachi Nuclear Energy Americas, LLC
IP	NRC Inspection Procedure
Mw(t)	Megawatt Thermal
NFS	Nuclear Fuel Services
NFS Project	NFS Liability Reduction Project
VBWR	Vallecitos Boiling Water Reactor
VNC	Vallecitos Nuclear Center