



SMUD

SACRAMENTO MUNICIPAL UTILITY DISTRICT
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Docket No. 050-00312

License No. DPR-54

P.O. Box 15830, Sacramento, CA 95852-1830; 1-888-742-SMUD (7683)

MPC&D 08-006

January 8, 2008

State of Utah
Department of Environmental Quality
168 North 1950 West
Salt Lake City, UT 84114-4850

Rancho Seco Nuclear Generating Station
Generator Access Permit Number: 0109 000 002
RESPONSE TO NOTICE OF VIOLATION

Attention: Jule L. Fausto

In a letter dated December 11, 2007, the Sacramento Municipal Utility District (SMUD) received a Notice of Violation (NOV) from the State of Utah, Department of Environmental Quality. The violation was identified on November 26, 2007, regarding radioactive waste shipment number 0802-15-0046 from Rancho Seco Nuclear Generating Station to Energy Solutions' Clive site in UT.

Attached is our response to the violation including corrective actions taken by SMUD and its contractor to prevent recurrence. If you, or members of your staff, have questions requiring additional information or clarification, please contact Bob Jones at (916) 732-4843.

Sincerely,

Steve Redeker
Manager, Plant Closure & Decommissioning

Cc: NRC, Region IV

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DISCUSSION

Between October 25, 2007, and November 13, 2007, Sacramento Municipal Utility District (SMUD) subcontractor personnel loaded radioactive waste into gondola rail car ENVX206142. The waste materials consisted of large bore piping wrapped with plastic as a contamination control measure, concrete debris in lift liner sacks, filters from the HVAC system and other DAW material.

The large bore piping was loaded into the gondola railcar in such a way that each of the pipes was "blocked and braced" in place against the side wall of the gondola railcar, against other piping, and lift liners. Blocking and bracing of the waste loaded in the railcar was evaluated by Duratek and SMUD personnel, and it was determined that it would be sufficient to hold the radioactive waste in place under conditions normally incident to transportation.

After railcar loading was completed a survey was performed and used to classify the waste in the railcar as LSA I (bulk unpackaged waste), Class A unstable. A Uniform Low-Level Radioactive Waste Manifest was completed (0802-15-0046) in accordance with SMUD procedures, transportation was ordered, and a five working-day shipment notification was delivered to EnergySolutions at Clive.

On November 17, 2007 Union Pacific Railroad arrived at the Rancho Seco site and picked up railcar ENVX206142 and it was transported to EnergySolutions disposal site at Clive Utah where it arrived on November 26, 2007. On November 26, 2007, the Rancho Seco reactor building decommissioning project was notified by the EnergySolutions Clive disposal site that ENVX206142 had been received with a small breach in the side wall. The railcar had been surveyed and there was no smearable contamination detected, and there was no release of radioactive material from the railcar.

After receiving the notification from Clive and as part of the immediate corrective actions, Duratek on-site personnel issued a First Notification and halted loading of large debris into gondola rail cars. Project personnel evaluated the cause of the damage to the railcar and determined the most likely cause was that the railcar was "humped" during transit from Rancho Seco to Clive. The force of the humping action could cause the pipe that was braced against the conveyance sidewall to shift piercing the side of the railcar.

CORRECTIVE ACTIONS

Prior to beginning loading of large debris in railcars the Duratek Waste Manager and the SMUD Field Engineer will develop a blocking and bracing plan. Loading of large, loose demolition debris is an infrequent occurrence and is expected to occur only in one additional evolution (i.e., polar crane dismantling, packaging, and shipping) during Rancho Seco decommissioning, which is scheduled to be completed this year. The blocking and bracing plan will ensure compliance with the federal regulations regarding blocking and bracing and preventing the shifting of loads.

Response To Notice Of Violation
State Of Utah Generator Access Permit Number 0109 000 002.

Once the blocking and bracing plan has been developed and approved, project personnel responsible for loading radioactive waste in railcars will be trained on the blocking and bracing plan and the requirements of federal regulations, and SMUD procedures governing blocking and bracing of radioactive waste.

Elements of the blocking and bracing plan will include:

1. Use of a wood (plywood) "cushion" that will be installed along the walls and floor of the conveyance in order to protect the steel of the floor and sidewall and minimize the effect of the railroad humping the railcar in transit.
2. Use of a combination of tie-down straps, toe boards, wood, steel, and other shoring material that will prevent shifting of debris.
3. Blocking and bracing will be verified by the Duratek Waste Manager, and by the SMUD Field Engineer. Evaluation of the blocking and bracing will be documented on the Radioactive Shipment Quality-Control Checklist (RAD-055)