

July 29, 2008

Mr. Steve J. Redeker, Manager
Plant Closure & Decommissioning
Sacramento Municipal Utility District
14440 Twin Cities Road
Herald, CA 95638-9799

SUBJECT: RANCHO SECO NUCLEAR GENERATING STATION - APPROVAL OF FINAL STATUS SURVEY REPORT 2

Dear Mr. Redeker:

By letter dated January 24, 2008, Sacramento Municipal Utility District (SMUD) submitted final status survey reports (FSSRs) for the following survey units:

- 8080011 East & West Cooling Towers – a class 3 survey unit. The survey unit consists of the interior of the cooling tower basins. The area is 47415 m².
- 8090011 Sewer Plant – a class 3 survey unit. The Sewer Plant survey unit consists of the paved area surrounding the sewage treatment facility located south of the cooling towers. The area is 262 m².
- 813000 Auxiliary Building – a class 1 survey area on the floor and lower walls, and a class 2 survey area on the upper walls and ceiling. The Auxiliary Building contained the systems used to transport process and contain radioactive solids, gases and liquids. The surveys presented in this submittal are for the following rooms: 1, 2, 11, 12, 19, 20, 23, 25, 37, 38, 39, 40, 41, 42, 54, 55, 130, 131, 222, 345, 202, 204 and Non-Controlled Rooms.
- 8240001 Plant Cooling Water Intake – a class 2 survey unit. The Plant Cooling Water Intake Structure brought clean cooling water to the cooling tower basins. It is located within the Industrial Area south of the Cooling Towers. The area is 252 m².
- 8260001 Condensate Pit Sump – a class 1 survey area. The Condensate Pit Sump consists of the area left behind following remediation of the condensate pump sump. It is located within Turbine Building. The area is 36 m².
- 8261001 South Turbine Pedestal – a class 3 survey unit. The South Turbine Pedestal was the reinforced concrete structure that provided support for the turbine. The area is 633.7 m².
- 8260002 Turbine Building Polisher Sump – a class 1 survey unit. This sump collected leakage from the condensate polisher demineralizers which were located at grade level at the south end of the Turbine Building. The area is 22 m².

- 8480013-16 Retention Basin Discharge Boxes and Manholes – a class 3 survey area. The Discharge Boxes and Manholes were part of the underground transport system that carried discharge Water to the retention basins. The area of each survey unit is 71.3, 93, 26.8, and 137 m² respectively.
- 8500011-14 Solidification Pad – a class 1 survey unit. The Solidification Pad was located to the east of the Auxiliary Building and previously housed the radwaste solidification equipment. The area of each survey unit is 236, 211, 43, and 118 m² respectively.
- 8990021 Aux Feedwater – a class 3 survey area. The Auxiliary Feedwater piping provided an alternate pathway for delivering feedwater to the steam generators. It consisted of both 2.5" and 6" pipe. The total internal surface area of the pipe surveyed was 5.2 m².
- 8990060 Component Cooling Water – a class 3 survey unit. The component Cooling Water piping provided a pathway for cooling water to various heat exchangers and operating system coolers. It consisted of 3" pipe. The internal surface area of pipe surveyed was 3.6 m².
- 8990091 Clean Drains to Effluent – a class 3 survey unit. The Clean Drains to Effluent piping collected leakage from clean systems and storm water and routed it to the liquid effluent piping for release. It consisted of 12", 15", and 18" pipe. The internal surface area of pipe surveyed was 77 m².
- 8990281 Main Condensate Pipe – a class 3 survey area. The Main Condensate piping supplied makeup water to the condensate system. It consisted of 4", 12" and 108" pipe. The internal surface area of pipe surveyed 135.7 m².
- 8990431 Service Air Pipe – a class 3 survey unit. The Service Air piping provided compressed air throughout the site for operating air-powered tools and regenerating demineralizers. It consisted of 1", 2" and 3" pipe. The internal surface area of pipe was 207 m² and 2.4 m² was surveyed.
- 8990501 Waste Gas Pipe – a class 3 survey unit. The Waste Gas piping transported radioactive gas from various systems to the gas decay tanks then through the filters to the gaseous effluent release point. It consisted of 2" pipe. The internal surface area of pipe surveyed was 24.1 m².
- 8991071,2 Clean Drains & Oily Water Separator – a class 3 survey area. The Clean Drains & Oily Water Separator piping collected water from clean drains, transported to the oily water separator then to the liquid effluent release point. It consisted of 4", 6", 10", and 18" pipe and the concrete oily water separator vault. The internal surface areas surveyed were 115.2 and 764.9 m² respectively.
- 8991092 Clean Drains & Regenerant Holdup Tank – a class 1 survey unit. The Clean Drains & Regenerant Holdup Tank piping drained the Tank Farm and Aux

Boiler Pad areas which were known to be contaminated and routed the water to the effluent discharge point. It consisted of 8" pipe. The internal surface area surveyed was 187 m².

Based on our review of the submitted FSSRs we have determined that the subject FSSRs are consistent with the previously approved License Termination Plan (LTP) and are therefore acceptable.

However, we have two comments for your consideration;

- 1) Some inconsistencies (among different preparers) were noted in the assessment of potential hot spot areas. Some FSSR preparers appear to always use 0.5 m² as the cut-off value for hot spot areas, and others preparers appear to use a smaller area and the corresponding area factor (AF). The LTP lists AF values for 0.5 m² and larger areas so we could not verify the AF values for areas smaller than 0.5 m². [See FSSRs 8130121 & 81300031] Both approaches seem to be valid ways to assess situations with elevated radioactivity.
- 2) FSSR 8130031, Table 3-1, Survey Unit Investigation, appears to have typographical errors. The AF for 0.75 m² is given as 194 and as 19.4. Other values in Table 3-1 appear to indicate that the value of 194 for the AF could be the correct AF for 0.075 m².

In accordance with 10 CFR 2.390 of the U.S. Nuclear Regulatory Commission's (NRC) "Rules of General Applicability," a copy of this letter and the referenced correspondence will be available electronically in the NRC Public Document Room or from the Publically Available Records

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If you have any questions concerning this matter, please contact me at (301) 415-3017.

Sincerely,

/RA/

John B. Hickman, Project Manager
Reactor Decommissioning Branch
Decommissioning and Uranium Recovery
Licensing Directorate
Division of Waste Management
and Environmental Protection
Office of Federal and State Materials and
Environmental Management Programs

Docket No.: 50-312

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