



HITACHI

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Attn: Document Control Desk

June 23, 2008

Subject: EVESR Technical Specifications, Amendment 7
Reference: License DR-10, Docket 50-183
Enclosures: 1) Appendix A, EVESR Technical Specifications Affected pages 1 & 3
2) Appendix A, Technical Specifications EVESR (Complete set incorporating proposed changes)

Paragraph 3.C of License No. DR-10, Amendment No. 6 authorizes GE-Hitachi to dispose of components parts or devices from the EVESR facility in accordance with the provision of 10 CFR Part 20. GEH plans to begin removal of piping, pumps, valves, control systems, walkways and some non-structural shielding as part of The Vallecitos Nuclear Center Liabilities Reduction Project as authorized. There are no plans to remove the reactor vessel or the biological shield.

To clarify the scope of these activities and specify the radiological control requirements of 10 CFR Part 20, GEH requests the following changes to the EVESR Technical Specifications:

Proposed Change 1) Delete "provided such activities do not involve access, except for reason of inspection, maintenance, and surveillance, to areas below the 549-ft. elevation within the containment building" from page 1 of Technical Specification Section A.2. GEH request condition A.2 be amended as follows:

A.2 "The principal activities carried on within the plant area shall be the possession of the reactor facility, the dismantling of components other than the reactor pressure vessel, and activities authorized by licenses issued by appropriate regulatory authorities."

Proposed Change 2) Delete the paragraph below condition C.3, Surveillance and Security in its entirety and replace with the following:

"Access to areas of the EVESR containment shall be controlled in a manner consistent with the requirements of 10 CFR 20.1601, Control of access to high radiation areas, as applicable."

The scope of the work associated with the liabilities reduction project will involve access to areas below 549-ft. elevation. Recent radiological surveys of the accessible areas below the 549-ft. elevation indicate that not all areas meet the High Radiation Area Controls criteria as specified in 10CFR20. Routine radiological surveys will be performed during the work and the areas will be posted and controlled consistent with the requirements of 10 CFR Part 20.

Enclosure 1 includes marked up pages 1 and 2 of the proposed changes. Enclosure 2 is a complete set of Technical Specifications incorporating the proposed changes identified in Enclosure 1.

Upon approval, GEH requests issuance of Enclosure 2 as the complete set of Technical Specifications for EVESR License DR-10. If you have any questions or need additional information, please contact me at 925-862-4360.

Sincerely Yours,

LaTonya L. Mahlahla

Date:
2008.06.24
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LaTonya L. Mahlahla
Mgr., Regulatory Compliance & EHS

cc: John Buckley
Bob Evans

Enclosure 1
Appendix A, EVESR Technical Specifications
Affected pages 1 & 3

APPENDIX A
TECHNICAL SPECIFICATIONS
EVESR

A. SITE

1. Plant Area

The plant area shall consist of a controlled access area defined by the reactor containment building and its ventilation system. Personnel access shall be controlled by knowledgeable plant personnel as established by written procedure.

2. Principal Activities

The principal activities carried on within the plant area shall be the possession of the reactor facility, the dismantling of components other than the reactor pressure vessel and activities authorized by licenses issued by appropriate regulatory authorities, ~~provided such activities do not involve access, except for reason of inspection, maintenance and surveillance, to areas below the 549-ft. elevation within the containment building.~~

Delete

B. ADMINISTRATIVE AND PROCEDURAL REQUIREMENTS

1. General

Activities involving access to the plant area and use of any area or in-place equipment shall be conducted under the direction of a designated facility supervisor with functional responsibility and commensurate

* Amendment 3, June 11, 1976 (Complete set of Tech Specs Issued)

of 10 CFR Part 20. A general radiation survey shall be conducted, at least annually.

2. Ventilation

A ventilation particulate monitor shall be operable whenever the containment building is ventilated.

3. Surveillance and Security

Delete
~~Access to areas below the 549-ft. level shall remain covered by concrete blocks over the reactor vessel and the head and shield plug storage pit, by a wood cover over the empty spent fuel storage pool and by locked covers on the personnel and equipment access hatchways. Keys to locks on the hatches and on the crane power switch shall be available only to the facility supervisor or his designated alternate.~~

Access to areas of the EVERS containment shall be controlled in a manner consistent with the requirements of 10CFR 20.1601,

4. Removal of Materials and Equipment

"Control of access to high radiation areas" as applicable
As a radiation and contamination control measure, all materials and equipment removed from radioactive materials areas shall be monitored and released in accordance with Vallecitos Nuclear Center site *procedures* and in compliance with the standards of 10 CFR Part 20.

D. RECORDS

Sufficient records shall be kept to establish that the facility is being maintained within the limitations of the facility license.

Enclosure 2
Appendix A, EVESR Technical Specifications
Complete set incorporated proposed changes

**Appendix A to License DR-10
EVESR Technical Specifications**

A. SITE

1. Plant Area

* The Plant area shall consist of a controlled access area defined by the reactor containment building and its ventilation system. Personnel access shall be controlled by knowledgeable plant personnel as established by written procedure.*

2. Principal Activities

The principal activities carried on within the plant area shall be the possession of the reactor facility, the dismantling of components other than the reactor pressure vessel, and activities authorized by licenses issued by appropriate regulatory authorities.

B. ADMINISTRATIVE AND PROCEDURAL REQUIREMENTS

1. General

Activities involving access to the plant area and use of any area or in-place equipment shall be conducted under the direction of a designated facility supervisor with functional responsibility and commensurate authority to maintain the facility in a safe and secure condition at all times. The facility manager shall have extensive reactor knowledge and shall utilize the resources of other licensee personnel as necessary to provide an effective safety program.

2. Review and Audit

- (a) Written procedures for control of access to the plant area, use of the plant area facilities and equipment and for periodic inspection of the facility shall be established and approved by the manager to whom the facility supervisor reports.
- (b) Written procedures specified in 2.(a) above shall be reviewed by technically qualified personnel responsible to a management position other than the facility supervisor (the Nuclear Safety group) in accordance with a written charter for that function.
- (c) The Nuclear Safety group shall periodically audit activities conducted in the plant area to verify that effective radiological control practices are maintained.

Appendix A to License DR-10 EVESR Technical Specifications

C. HEALTH AND SAFETY

1. Radiation Monitoring

Radiation monitoring instruments shall be available as appropriate to prevent exposure of personnel to radiation in accordance with the standards of 10 CFR part 20. A general radiation survey shall be conducted at least annually.

2. Ventilation

* A ventilation particulate monitor shall be operable whenever the containment building is ventilated.*

3. Surveillance and Security

Access to areas of the EVESR containment shall be controlled in a manner consistent with the requirements of 10 CFR 20.1601, Control of access to high radiation areas, as applicable.

4. Removal of Materials and Equipment

As a radiation and contamination control measure, all materials and equipment removed from radioactive materials areas shall be monitored and released in accordance with Vallecitos Nuclear Center site *procedures* and in compliance with the standards of 10 CFR part 20.

D. RECORDS

Sufficient records shall be kept to establish that the facility is being maintained within the limitations of the facility license.