



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

December 19, 2008

Ross T. Ridenoure
Senior Vice President
and Chief Nuclear Officer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, California 92674-0128

SUBJECT: NRC INSPECTION REPORT 050-00206/08-016

Dear Mr. Ridenoure:

This refers to the inspection conducted on November 17-20, 2008, at Southern California Edison Company's San Onofre Nuclear Generating Station, Unit 1 facility. This inspection was an examination of 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 an examination of selected procedures and representative records, observations of activities, and interviews with personnel. The enclosed report presents the results of this inspection.

Based on the results of this inspection, the NRC has determined that a Severity Level IV violation of NRC requirements occurred. The violation involves your failure to conduct compensatory sampling, as required by the Offsite Dose Calculation Manual, of yard sump water being released to the environment. The violation is being treated as a noncited violation (NCV), consistent with Section VI.A of the Enforcement Policy. The NCV is described in the subject inspection report. If you contest the violation or significance of the NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with copies to: (1) the Regional Administrator, Region IV, 612 East Lamar Blvd., Arlington, TX 76011-4125; (2) the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and (3) the senior resident inspector at your San Onofre Nuclear Generating Station facility.

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 you choose to provide one, 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's 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. Robert Evans, Senior Health Physicist, at (817) 860-8234.

Sincerely,

/RA/

Jack E. Whitten, Chief
Nuclear Materials Safety Branch B

Docket: 050-00206
License: DPR-13

Enclosure:
NRC Inspection Report 050-00206/08-016

cc w/enclosure:
Chairman, Board of Supervisors
County of San Diego
1600 Pacific Highway, Room 335
San Diego, CA 92101

Gary L. Nolff
Assistant Director-Resources
City of Riverside
3900 Main Street
Riverside, CA 92522

Mark L. Parsons
Deputy City Attorney
City of Riverside
3900 Main Street
Riverside, CA 92522

Gary Yamamoto, Chief
Division of Drinking Water and
Environmental Management
California Department of Public Health
1616 Capital Ave., Mail Stop 7400
P.O. Box 997413
Sacramento, CA 95899-7413

Michael J. DeMarco
San Onofre Liaison
San Diego Gas & Electric Company
8315 Century Park Court, CP21G
San Diego, CA 92123-1548

Gary Butner, Chief
Radiological Health Branch
Department of Public Health
P.O. Box 997414 (MS 7610)
Sacramento, CA 95899-7414

Mayor
City of San Clemente
100 Avenida Presidio
San Clemente, CA 92672

James D. Boyd, Commissioner
California Energy Commission
1516 Ninth Street (MS 34)
Sacramento, CA 95814

Douglas K. Porter, Esq.
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, CA 91770

A. Edward Scherer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

Albert R. Hochevar
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

Michael P. Short
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

Chief, Radiological Emergency Preparedness Section
National Preparedness Directorate
Technological Hazards Division
Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

bcc w/enclosure (via e-mail distribution):

A. Howell

J. Whitten

J. Shepherd, FSME/DWMEP/DD

G. Warnick, SRI

R. Evans

J. Walker

M. Herrera, Fee Coordinator

Hard Copy:

NMSB-B File

SUNSI Review Completed: RJE ADAMS: ☒ Yes ☐ No Initials: RJE
☒ Publicly Available ☐ Non-Publicly Available ☐ Sensitive ☒ Non-Sensitive

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U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket: 050-00206

License: DPR-13

Report: 050-00206/08-016

Licensee: Southern California Edison Co.
P.O. Box 128
San Clemente, California 92674

Facility: San Onofre Nuclear Generating Station, Unit 1

Location: San Clemente, California

Dates: November 17-20, 2008

Inspector: Robert J. Evans, PE, CHP, Senior Health Physicist
Nuclear Materials Safety Branch B

Approved By: Jack E. Whitten, Chief
Nuclear Materials Safety Branch B

Attachment: Supplemental Inspection Information

ENCLOSURE

EXECUTIVE SUMMARY

San Onofre Nuclear Generating Station, Unit 1 NRC Inspection Report 050-00206/08-016

This inspection was a routine, announced inspection of decommissioning activities being conducted at the San Onofre Nuclear Generating Station, Unit 1 facility. In summary, the licensee was conducting decommissioning in compliance with regulatory and license requirements, with one exception as listed below.

Organization, Management, and Cost Controls

- The licensee's organizational structure was in compliance with license and procedural requirements. The licensee had sufficient staff for the work in progress (Section 1).

Safety Reviews and Self-Assessments

- The licensee conducted self-assessments and quality assurance audits of Unit 1 activities in accordance with procedure and license requirements (Section 2).

Decommissioning Performance and Status Review

- The licensee conducted decommissioning work with an emphasis on industrial and radiological safety. Area postings, signs, radiation levels, and boundaries were in agreement with regulatory requirements (Section 3.2.a).
- The licensee accidentally pumped approximately 4,000 gallons of yard sump water to the environment without monitoring. Although the unmonitored water most likely did not contain licensed material, the unmonitored release was a noncited violation (Section 3.2.b).
- The licensee took extensive corrective actions in response to its discovery of a contaminated tool outside of the radiologically restricted area. The incident was determined to be a minor finding with limited radiological safety consequences (Section 3.2.c).
- The inspector determined that the licensee did not have a formal written process in place for the release of radioactive material areas, although this finding had only minor radiological safety consequences (Section 3.2.d).

Inspection of Final Surveys

- The licensee established and implemented a program for the performance of final characterization surveys at Unit 1. The licensee's staff conducted the surveys in accordance with site procedures. The inspector conducted confirmatory surveys in two survey units. Licensed radioactive material was not identified in these survey units suggesting that the licensee had effectively remediated these areas (Section 4).

Radioactive Waste Treatment, and Effluent and Environmental Monitoring

- The licensee conducted radioactive waste handling and shipping operations in accordance with regulatory requirements and site procedures (Section 5).

Report Details

Summary of Plant Status

San Onofre Nuclear Generating Station, Unit 1, was permanently shut down during November 1992 and was permanently defueled by March 1993. The unit remained in SAFSTOR until June 1999 when decommissioning was initiated. At the time of this inspection, the licensee was conducting decommissioning activities in accordance with its Post Shutdown Decommissioning Activities Report dated December 15, 1998.

During the inspection, work in progress included the licensee's excavating of contaminated subsurface components and soils. After excavating, and confirming that contaminated soil had all been removed from the trench, the licensee backfilled the areas with clean soil. The components being excavated included underground pipes and drain lines in the northern, western, and southern portions of the property. In addition, the licensee was constructing a utility trench that traversed through the western and southern portions of the property. Other work in progress at the site included construction of a covered storage facility for the Units 2/3 steam generators. The licensee plans to use the covered storage facility to replace the steam generators during future refueling outages.

1 Organization, Management, and Cost Controls (36801)

1.1 Inspection Scope

The inspector reviewed the licensee's organizational structure to ensure that the licensee had sufficient staff and managerial oversight for the work in progress.

1.2 Observations and Findings

The organizational structure requirements are provided in the Unit 1 Technical Specifications, Defueled Safety Analysis Report, and Topical Quality Assurance Manual. In addition, organizational responsibilities are provided in the Site Radiological Characterization Plan. The licensee announced one organizational change since the last inspection. On November 7, 2008, the NRC was officially notified that the previous Vice President-Engineering and Technical Services had elected to retire, and a new individual was selected by the licensee to fill the position.

The inspector compared the actual organizational structure to the required structures, and the inspector concluded that all management positions had been filled. In addition, the inspector noted that the licensee had sufficient staff for the occupational safety, quality assurance, and health physics work that was in progress at the Unit 1 site.

1.3 Conclusion

The licensee's organizational structure was in compliance with license and procedural requirements. The licensee had sufficient staff for the work in progress.

2 Safety Reviews and Self-Assessments (37801, 40801)

2.1 Inspection Scope

The inspector evaluated the effectiveness of the licensee in identifying, resolving, and preventing issues that degrade safety or the quality of decommissioning.

2.2 Observations and Findings

The inspector reviewed Unit 1 audits and self-assessments conducted by the licensee to ensure compliance with regulatory requirements and license conditions. The self-assessments conducted by the licensee included quality assurance (QA) audits, QA surveillances, and leadership observations. At the time of the inspection, the licensee was conducting oversight of Unit 1 activities primarily through the implementation of the quality leadership observation program.

Under the quality leadership observation program, QA personnel would observe an activity in the field and would document their evaluations. Unsatisfactory observations made by the QA auditors would result in corrective actions being identified and implemented. The activities being observed included independent spent fuel storage installation construction, industrial safety, event response evaluations, decommissioning work, shipment of radioactive material, and radiological survey data collection. Recent evaluations also included third-party reviews of data documentation. The quality leadership observations could also be used to support future QA surveillances and audits.

The licensee is required to conduct routine QA audits to ensure compliance with regulatory requirements and license conditions. The licensee typically conducted audits of Unit 1 activities in conjunction with routine site-wide audits. The QA audits had either been completed timely or were scheduled to be completed.

2.3 Conclusions

The licensee conducted self-assessments and QA audits of Unit 1 activities in accordance with procedure and license requirements.

3 Decommissioning Performance and Status Review (71801)

3.1 Inspection Scope

The inspector evaluated whether the licensee and its contracted workforce were conducting decommissioning activities in accordance with the license and regulatory requirements.

3.2 Observations and Findings

a. Decommissioning Performance

The inspector observed decommissioning activities in progress. The work in progress included excavation of subsurface piping and drain lines. Industrial safety and radiation protection controls had been established by the licensee and were evident in

decommissioning activities observed by the inspector. Safety representatives and health physics personnel were observed to be continuously present during work activities. The inspector concluded that the radiological controls in place at the time of the inspection were in agreement with regulatory requirements.

The inspector learned that in recent weeks the licensee had replaced the two yard sump pumps. The reason the two sump pumps had to be replaced was due to corrosion caused by pumping brackish water. In addition, the licensee had previously installed approximately a dozen dewatering wells to support subsurface reclamation activities. At the time of the inspection, two of the dewatering pumps remained available for use. However, the two dewatering pumps were not in service during the inspection because the subsurface work being conducted at Unit 1 was above the groundwater table.

When the dewatering wells were in service, the licensee routinely sampled the pumped fluid which consisted primarily of groundwater. The water samples were collected and analyzed for total gamma activity and tritium concentrations. The inspector reviewed the sample result data of the water samples collected and analyzed since the August 2008 inspection. The sample results maintained by the licensee indicated that the water had not contained any radioactivity in concentrations greater than the minimum detectable concentrations of the sampling equipment.

The inspector conducted a radiological survey of the Unit 1 reactor pressure vessel transportation package. The inspector's objective for the survey was to ensure that the posted radiological conditions had not changed. The inspector measured the ambient gamma exposure rates emanating from the transportation package. The radiological survey was conducted using a Ludlum Model 19 microRoentgen meter (NRC 015544, calibration due date of 02/14/09). With a background of 10 microRoentgens per hour ($\mu\text{R/hr}$), the highest measurement in the unrestricted area was approximately 175 $\mu\text{R/hr}$. This measurement was below the regulatory limit of 2,000 $\mu\text{R/hr}$ (2 millirems in any one hour) for unrestricted areas. The measured exposure rates were consistent with the exposure rates posted by the licensee.

b. Release of Unmonitored Sump Water

During late October 2008, the licensee identified that it had allowed approximately 4,000 gallons of water to be released to the environment without being monitored as required by the Offsite Dose Calculation Manual (ODCM). The unmonitored water originated from the north industrial area yard sump. This yard sump was used to collect rainwater and other sources of water that could have come into contact with potentially contaminated grounds. The water in the sump is normally monitored by the licensee during release by liquid radiation Monitor R-2101.

Prior to the unmonitored water release having occurred, the yard sump pumps were removed from service for maintenance. Following maintenance, the sump pumps were tested, and the pump controls were returned to automatic operation. On October 24, 2008, one of two pumps was tripped as designed and automatically started pumping. The pump removed approximately 4,000 gallons of fluid to the environment through the Units 2/3 outfalls. However, the radiation monitor designed to assess the radiological content of the water had been taken out of service at that time. Two days later, the licensee identified that the pumps were in automatic, and the licensee took compensatory actions at that time.

Facility Operating License DPR-13, Condition 2.C(2), states that the licensee shall maintain the Unit 1 facility in accordance with Technical Specifications. Technical Specification D6.8.1 specifies, in part, that written procedures shall be established, implemented, and maintained for the ODCM. The ODCM requires, in part, compensatory sampling of the yard sump fluid during pumping operations if the radiation monitor is out of service when fluids are being pumped from the sump. According to Table 4-1 in the ODCM, grab samples are required to be collected at least once per 12 hours during the release when the radiation monitors are out of service. The licensee identified that it had not conducted compensatory sampling because the chemistry department had not been aware that the pumps were in the automatic mode of operation.

The operation of the sump pump with the out-of-service radiation monitor resulted in an unmonitored release of fluid to the environment. However, water sampling conducted by the licensee before and after the release suggested that the fluid released had not contained measurable quantities of radioactivity. The sump water had been sampled 2 days before and 2 days after the release occurred. Both water sample results collected by the licensee indicated that the samples contained nondetectable quantities of radionuclides. Therefore, the incident likely did not result in an actual release of measurable quantities of radioactive material to the environment.

The failure to implement ODCM-required compensatory sampling during sump pump operations conducted on October 24, 2008, was identified as a violation of license requirements (NCV 050-00206/16-01). In accordance with Section VI.A of the Enforcement Policy, this licensee-identified and licensee-corrected violation is not being cited. The licensee identified the problem and took corrective actions. The licensee initially concluded that the event was the result of human error. A direct cause evaluation report was issued by the licensee to document the event and to formulate corrective actions. In accordance with license requirements, the release will be formally reported to the NRC in the next Annual Radioactive Effluent Release Report.

c. Identification of Contaminated Tools

On September 4, 2008, the licensee identified a contaminated wooden-handled sledge hammer outside of the Unit 1 radiologically restricted area. In response to identifying the contaminated article, the licensee quarantined the tool box and conducted radiological surveys on all tools within the quarantined area. The licensee, following the discovery of the contaminated hammer, elected to conduct a comprehensive survey of all tools in the Unit 1 north industrial area. The contamination survey lasted several weeks and resulted in roughly 15,000 tools being surveyed by the licensee. As a result of the licensee survey activities, a small number of tools were identified with detectable levels of fixed contamination.

The reasons for contaminated tools being present in unrestricted areas were not clear. However, the licensee stated that the existence of the contaminated articles could have been related to previous poor work practices or levels of survey instrument sensitivity used by personnel when measuring levels of contamination. The licensee also indicated that the contaminated tools could have either been poorly surveyed prior to release, or the contaminated tools could have been brought into the Unit 1 north industrial area from outside of the area by contractors. Also, the tools could have been initially surveyed in the areas with higher radioactive background levels. When the tools were resurveyed by

the licensee in a lower radioactive background area using sensitive small article monitors, the resurvey could have identified residual contamination that was previously undetected. Short-term corrective actions taken by the licensee included implementation of a new tool control work process.

The NRC inspector reviewed the licensee's response to the contaminated tool incident and determined that it was comprehensive. The licensee identified the problem and subsequently resurveyed all tools in the Unit 1 north industrial area. The inspector determined that the quantities of fixed contamination on the tools were not significant health and safety hazards and that there was no evidence discovered by the inspector or licensee that any contaminated tools had left the site. Further, a final contamination survey is routinely conducted by the licensee on all tools leaving the north industrial area, so it is likely the contaminated tools could have been identified through this final release survey.

The NRC inspector conducted a radiological survey of equipment located within the north industrial area that had been segregated for free release from the area. The survey was conducted using an Eberline E600 survey meter with SHP380AB probe (NRC No. 063472 with a calibration due date of 08/04/09). Prior to the survey, the inspector collected background measurements. The inspector surveyed metal plates, plywood, boards, and piping. In summary, the contamination levels on the equipment surveyed by the inspector were indistinguishable from background levels. The NRC inspector concluded that the equipment staged for unrestricted release could be free-released to an unrestricted area.

d. Review of Radioactive Materials Area Boundaries

The inspector conducted a review of the licensee's procedural requirements for removal of radioactive material area boundaries. The licensee routinely establishes temporary radioactive material areas as necessary to support emerging work involving radioactive material. The licensee indicated that it was necessary to establish these radioactive material areas for short-term storage of radioactive material or for work involving potentially radioactive or contaminated materials. The inspector questioned the licensee about their practice for releasing these areas following the completion of work. In particular, the inspector questioned whether the licensee had established a consistent protocol for conducting radiological surveys prior to free-release of the areas.

In summary, the licensee had not developed procedural guidance for the release of radioactive material areas. The inspector questioned the licensee as to whether the lack of procedures could result in inconsistent release of the areas. The licensee stated that the responsibility for release of these radioactive material areas was assigned to the specific health physics supervisors, and each supervisor used his or her judgment to determine the survey requirements, if any, for release of these areas. For example, a radioactive materials area that was established only to store packaged radioactive wastes in intermodal containers was not normally surveyed because the supervisor assumed that loose radioactive materials were not present in the area based on previously conducted contamination surveys taken on the waste containers prior to being moved into the radioactive materials area.

On occasion, the licensee conducted and documented surveys of radioactive material areas prior to the removal of the boundaries and the release of the areas. The inspector

reviewed two completed surveys. The areas were documented to be free of contamination. In both situations, the licensee conducted the surveys because loose radioactive material could have been present in these two areas.

In response to the inspector's questions, the licensee issued Nuclear Notification 200222433 to assess the need for procedures in this program area. The licensee's review is expected to consider all site-wide impacts. The licensee's review will include corrective actions needed, if any, that are identified in response to this Nuclear Notification.

Despite the lack of procedural guidance in this program area, the NRC inspector did not identify any example in which a radioactive material area was improperly released. In addition, the released areas continue to remain within the Unit 1 north industrial area boundary, and the licensee does not plan to free-release the north industrial area from the license in the near future.

3.3 Conclusions

The licensee conducted decommissioning work with an emphasis on industrial and radiological safety. Area postings, signs, radiation levels, and boundaries were in agreement with regulatory requirements. The licensee accidentally pumped approximately 4,000 gallons of yard sump water into the environment without monitoring. Although the water most likely did not contain licensed material, the unmonitored release resulted in a noncited violation. The licensee took extensive corrective actions in response to its discovery of an incident involving a contaminated tool being located outside of the radiologically restricted area. The incident was determined to be a minor finding with limited radiological safety consequences. Finally, the inspector determined that the licensee did not have a formal written process in place for the release of radioactive material areas, although this finding had only minor radiological safety consequences.

4 **Inspection of Final Surveys at Permanently Shutdown Reactors (83801)**

4.1 Inspection Scope

The inspector verified that radiological measurements, surveys, and related documentation were being conducted by the licensee in accordance with site procedures and NRC guidance documents.

4.2 Observations and Findings

a. Observation of Final Characterization Survey

The inspector observed the performance of a final characterization survey in the Unit 1 north industrial area. The survey was conducted in the area of the former refueling water storage tank. The survey was conducted just prior to the area being covered and entombed with asphalt.

Prior to performing the survey, the licensee issued a final characterization survey plan to provide instructions for how to conduct the survey. The licensee elected to conduct a complete survey of the surface soils using survey meters for detecting ambient gamma

radiation levels. Further, the licensee collected 15 soil samples within the 800-square meter area. The inspector reviewed the survey plan and determined that it was in agreement with recommendations provided in NRC guidance documents and Unit 1 site procedures.

The licensee conducted walk-over surveys and collected the 15 soil samples. Based on the licensee's results, no measurement or sample result exceeded the respective action levels. As a check, the NRC inspector conducted a walk-over survey of the area using a Ludlum Model 19 MicroRoentgen meter. With a background of 16 $\mu\text{R/hr}$, the area surveyed by the inspector ranged from 13-21 $\mu\text{R/hr}$. Based on these sample results, the inspector determined that the surface of the survey unit was free of detectable quantities of licensed material. In summary, the licensee had conducted the survey in accordance with procedure requirements. The licensee stated that radiological survey results will eventually be documented in the Comprehensive Ground Record Program books for long-term retention.

b. Confirmatory Survey

The inspector conducted a confirmatory radiological survey in a survey unit located in the southern portion of the Unit 1 industrial area. The survey consisted of measurement of ambient gamma exposure rates in the auxiliary feedwater trench using a Ludlum Model 19 microRoentgen meter. This area had been previously excavated by the licensee after the discovery of a contaminated drain line. With a background of 13 $\mu\text{R/hr}$, the ambient gamma exposure rates ranged from 13-36 $\mu\text{R/hr}$. The highest exposure rates involved clayey soils, soils previously determined to be native soils containing naturally occurring radioactive material. In summary, no licensed radioactive material was identified and the sample results were consistent with the licensee's final characterization survey results. The confirmatory survey results obtained by the inspector suggest that the licensee had effectively remediated this area.

4.3 Conclusions

The licensee established and implemented a program for the performance of final characterization surveys at the Unit 1 site. The licensee's staff conducted the surveys in accordance with site procedures. The inspector conducted confirmatory surveys in two survey units. Licensed radioactive material was not identified in these survey units suggesting that the licensee had effectively remediated these areas.

5 Radioactive Waste Treatment, and Effluent and Environmental Monitoring (84750)

5.1 Inspection Scope

The inspector reviewed the licensee's program to control, monitor, and quantify releases of radioactive materials to the environment in liquid, gaseous, and particulate forms.

5.2 Observations and Findings

The inspector observed the loading of radioactive wastes into intermodals and the preparation of these intermodals for shipment to an out-of-state disposal site. Prior to work, the licensee conducted a safety briefing to ensure that all participants understood potential radiological and safety hazards. The inspector determined that the radioactive

waste materials being transported for disposal were being loaded into the intermodals in a safe and controlled manner. The inspector noted that the licensee had carefully controlled the weight of the intermodals to ensure compliance with weight restrictions during transportation.

During the loading of the intermodals, health physics personnel provided continuous oversight of the work. The licensee had collected an air sample to ensure that airborne dust was not a radiological hazard. Following loading operations, the licensee conducted radiological surveys of the intermodals. The licensee also added the necessary transportation labels to comply with U.S. Department of Transportation shipping regulations.

The inspector compared the intermodal loading work activities with guidance provided in written procedures, and the inspector concluded that the licensee had conducted the work in accordance with procedure requirements. Following completion of the work, the inspector reviewed the shipping papers and concluded that the papers were consistent with Department of Transportation shipping requirements. The inspector also ensured that the radioactive waste material remained within the limits specified in the waste profiles for disposal.

5.3 Conclusions

The licensee conducted radioactive waste handling and shipping operations in accordance with regulatory requirements and site procedures.

6 **Exit Meeting Summary**

The inspector presented the results of the inspection to members of licensee management at the exit meeting conducted on November 20, 2008. The licensee did not identify as proprietary any information provided to, or reviewed by, the inspector.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

D. Dick, Supervisor, Chemistry
S. Enright, Project Manager, Unit 1 Health Physics
S. Gardner, Compliance Engineer
S. Jones, Health Physics Engineer
D. Todd, Nuclear Oversight & Assessment
J. Morales, Manager, Projects
A. Scherer, Director, Nuclear Regulatory Affairs
C. Williams, Manager, Compliance
R. Woodard, Manager, Comprehensive Ground Record Program

INSPECTION PROCEDURES USED

36801 Organization, Management, and Cost Controls at Permanently Shutdown Reactors
37801 Safety Reviews, Design Changes, and Modifications at Permanently Shutdown Reactors
40801 Self-Assessment, Auditing, and Corrective Action at Permanently Shutdown Reactors
71801 Decommissioning Performance and Status Review at Permanently Shutdown Reactors
83801 Inspection of Final Surveys at Permanently Shutdown Reactors
84750 Radioactive Waste Treatment, and Effluent and Environmental Monitoring

ITEMS OPENED AND CLOSED

Opened

050-00206/16-01 NCV Failure to conduct compensatory sampling

Closed

050-00206/16-01 NCV Failure to conduct compensatory sampling

Discussed

None

LIST OF ACRONYMS AND ABBREVIATIONS

CFR	<i>Code of Federal Regulations</i>
μR/hr	microRoentgens per hour
NCV	noncited violation
ODCM	Offsite Dose Calculation Manual
QA	quality assurance