



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

January 9, 2009

Mr. James Shetler, Assistant General Manager
Energy Supply
Sacramento Municipal Utility District
6201 'S' Street
P.O. Box 15830
Sacramento, California 95852

SUBJECT: NRC INSPECTION REPORT 050-00312/08-004

Dear Mr. Shetler:

An inspection was conducted on October 27 through December 11, 2008, by the Nuclear Regulatory Commission (NRC) at your Rancho Seco Nuclear Generating Station. On December 10, 2008, the inspector briefed the Superintendent, Rancho Seco Assets, regarding the preliminary inspection findings. The enclosed inspection report provides the scope and results of the inspection.

The 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. Within these areas, the inspection included an assessment of your safety reviews, design changes, and modifications; decommissioning performance; final status surveys; and radioactive waste treatment, effluent, and environmental monitoring. The inspection determined that you were conducting decommissioning activities in compliance with license and regulatory requirements. During this inspection, a violation of 49 CFR 177.842(d) related to the failure to properly block and brace a radioactive waste shipment was reviewed. This non-repetitive and licensee corrected violation is being treated as a Non-Cited Violation, consistent with Section VI.A.8 of the NRC Enforcement Policy.

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, if you chose to make one, 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.

Sincerely,

/RA/

Jack E. Whitten, Chief
Nuclear Materials Safety Branch B

Docket No.: 050-00312
License No.: DPR-54

Enclosure:
NRC Inspection Report 050-00312/08-004
(w/Attachment)

cc w/enclosure:

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SUNSI Review Complete: EMG ADAMS: Yes No Initials: EMG
Publicly Available Non-Publicly Available Sensitive Non-Sensitive

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U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No.: 050-00312
License No.: DPR-54
Report No.: 050-00312/08-004
Licensee: Sacramento Municipal Utility District
Facility: Rancho Seco Nuclear Generating Station
Location: 14440 Twin Cities Road
Herald, California
Dates: October 27 – December 11, 2008
Inspector: Emilio M. Garcia, Health Physicist
Approved By: Jack E. Whitten, Chief
Nuclear Materials Safety Branch B
Attachments: Supplemental Information

Enclosure

EXECUTIVE SUMMARY

Rancho Seco Nuclear Generating Station NRC Inspection Report 050-00312/08-004

This inspection was a routine, announced inspection of decommissioning activities being conducted at the Rancho Seco Nuclear Generating Station. Areas inspected included safety reviews, design changes, and modifications, decommissioning performance, final status surveys, and solid radwaste management and transportation of radioactive materials.

Self-assessment, Auditing and Corrective Action

- The licensee had effectively maintained its Corrective Action Program used to control the identification, evaluation, and resolution of problems (Section 1.1).
- Audits conducted in 2006 – 2007 and scheduled for 2008 addressed all facility activities required to be audited. All auditors satisfied the qualification requirements (Section 1.2).

Decommissioning Performance and Status Review

- The licensee continued to remediate contaminated surfaces in a safe manner. Final status surveys had been completed on 306 of a projected 320 survey units constituting approximately 96% of the projected survey units (Section 2).

Inspection of Final Status Surveys

- The Oak Ridge Institute for Science and Education (ORISE) staff conducted confirmatory measurements on selected surfaces of the auxiliary, spent fuel, reactor and the turbine buildings and imbedded piping. The results of the ORISE surveys conducted during this inspection will be reported at a later date (Section 3).

Solid Radwaste Management and Transportation of Radioactive Materials

- Audits and surveillances of the transportation of radioactive materials were performance-based and were determined by the inspector to be complete. The overall quality and quantity of the audits and surveillances met the NRC's expectations (Section 4.1).
- 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 (Section 4.2).
- Personnel involved in the transfer, packaging and transport of radioactive waste and transportation of other radioactive materials had received initial training and periodic retraining (Section 4.3).

- A violation of 49 CFR 177.842(d) was identified related to the failure to properly block and brace a pipe in gondola. The pipe penetrated the side of the gondola when the rail car was “humped.” In accordance with NRC guidance, this non-repetitive, licensee corrected violation is documented as a non-cited violation (Section 4.4).
- The licensee maintained copies of the applicable regulations and the licenses of the recipients of radioactive materials that were shipped from the site. The inspector observed portions of the visual inspections undertaken by the licensee of waste containers stored in the Interim Onsite Storage Building (Section 4.4).
- The licensee had implemented a transportation program for radioactive materials in accordance with NRC and the U.S. Department of Transportation regulations (Section 4.5).

Report Details

Summary of Facility Status

The Rancho Seco Nuclear Generating Station (Ranch Seco) was permanently shut down in June 1989. All spent reactor fuel has been moved to an onsite Independent Spent Fuel Storage Installation. At the time of this inspection, the licensee was conducting decommissioning activities under the provisions of the incremental decommissioning option of Rancho Seco's Post Shutdown Decommissioning Activities Report dated March 20, 1997.

Decommissioning conducted by the licensee included work activities in the auxiliary building, reactor building, spent fuel building, and exterior areas. All major components had been removed, packaged, and shipped offsite for disposal. In the auxiliary building, remediation and final status surveys had been completed. In the reactor building, the concrete and steel removal project had been completed, including the removal of the reactor building polar crane. Remediation and final status surveys were completed in most of the reactor building. In the spent fuel building, remediation and final status surveys had been completed. At the time of the inspection, the licensee had completed final status surveys on approximately 96 % of all survey units.

1 Self-assessment, Auditing, and Corrective Action (IP 40801)

1.1 Identification, Evaluation, and Resolution of Problems

a. Inspection Scope

The inspector reviewed the licensee's administrative procedures that control the identification, evaluation, and resolution of problems.

b. Observations and Findings

The licensee's program for assessing the resolution of non-conformances, material or programmatic deficiencies, and conditions adverse to quality or safety remained as described in Section 1.2 of Inspection Report 050-00312/2006-002 and Section 1.2 of Inspection Report 050-00312/2007-002. Table 1 lists the applicable procedures of the Corrective Action Program (CAP). Three procedures of the Rancho Seco CAP had been revised since the NRC last inspected this program area in April 2008.

These three procedures were revised to reflect the transition from the radiological decommissioning organization to the industrial decommissioning organization. Significant changes included the designation of the Superintendent, Rancho Seco Assets as the senior manager for the site and the disbandment of the Commitment Management Review Group (CMRG). The responsibilities of the CMRG were transferred to the Superintendent, Rancho Seco Assets.

**Table 1
Rancho Seco Corrective Action Program Procedures**

Number	Title	Rev.	Effective
RSAP-0102	Stop Work Order	6	Mar 03, 1994
RASP-0260	Commitment and Compliance Management	14	Nov 10, 2008
RSAP-1301	Corrective Action Program	6	Sep 14, 2005
RSAP-1305	Corrective Action Request	3	Dec 09, 1993
RSAP 1308	Potential Deviation from Quality	18	Nov 10, 2008
RSAP-1310	Deviation from Quality	9	Nov 10, 2008

As of December 11, 2008, the inspector noted that the licensee had initiated 21 Potential Deviation from Quality reports (PDQ) during 2008 with 11 determined to be Deviation from Quality reports (DQ). No Corrective Action Requests or Stop Work Orders in 2008 had been initiated as of the date of this inspection. The inspector reviewed the list of PDQs and DQs that remained open. There were 13 items that remained open, including 8 opened in 2008. The oldest item remaining open was from 2005. The inspector concluded that the licensee was appropriately addressing the timely resolution of these open items.

The inspector reviewed agendas and minutes of CMRG meetings and noted that the CMRG had met, at a minimum, monthly as required by the previous revision Rancho Seco Administrative Procedure (RSAP) RSAP-0260, Commitment Management Review Group and Compliance Management Tracking Systems. The inspector confirmed that the CMRG membership was composed of the individuals described in RSAP-0260. The meeting records reviewed by the inspector indicated that the CMRG was conducting initial reviews and providing characterizations of the new PDQ. Additionally, the CMRG was assigning tasks, establishing priorities, and reviewing proposed resolutions for PDQs and other identified problems. On November 10, 2008, the licensee reorganized from the radiological decommissioning organization to the industrial decommissioning organization. Under the new organization the responsibilities of the CMRG were assigned to the senior individual on site, the Superintendent, Rancho Seco Assets. The inspector concluded that the licensee was effectively maintaining the Rancho Seco CAP established by the licensee to control the identification, evaluation, and resolution of problems.

The inspector reviewed and discussed with the license the completed records of two DQ reports, 07-020, Elevated Activity in Areas Previously Surveyed, and 08-017, Non-Conservative DCGL Calculations. The inspector concluded that the licensee had adequately evaluated the problems, identified probable causes, and initiated effective corrective actions to prevent recurrence.

c. Conclusion

The licensee was effectively maintaining the CAP that was established to control the identification, evaluation, and resolution of problems.

1.2 Quality Assurance Audit Organization, Staffing, and Qualifications

a. Inspection Scope

The inspector reviewed the licensee's process of conducting Quality Assurance (QA) audits and surveillances. Additionally, the inspector examined the status and composition of the QA audit organization, including the staffing and qualifications of individual members.

b. Observations and Findings

The inspector noted that the composition of the licensee's QA audit organization had not changed since the last NRC inspection, conducted in April 2008, but some of the specific positions filled by individual staff members had changed. Of particular note, one of the lead QA auditors had left the organization and had been replaced by another full time auditor. The records reviewed by the inspector confirmed that all auditors had current lead auditor certification.

The inspector reviewed records of audits completed since the last inspection of this area conducted by the NRC in April 2008. The licensee had completed all ten audits scheduled for 2008. Reports documenting the audits had been issued for all audits completed. Audits conducted in 2006 - 2008, addressed all 34 facility activities listed in the Rancho Seco Quality Manual (RSQM), Section XVIII. As of October 27, 2008, the licensee had conducted 24 audit surveillances, ten since this area was last inspected.

The inspector selected three audit reports for review: 08-A-07, Process Control Program for Processing, and Packaging Liquid Radioactive Waste and Packaging and Transportation of Radioactive Material; 08-A-008, Radiological Safety and Control and ALARA Program; and 08-A-009, Control and Accountability of Special Nuclear Material. The inspector also reviewed the nine audit surveillance reports performed since April 2008. The inspector confirmed that the audits and surveillances were conducted in accordance with the RSQM. Individuals who conducted the audits and surveillances were generally independent of the areas being audited. Audit 08-A-009, Special Nuclear Materials audit was lead by the Special Nuclear Materials manager. A memorandum to the QA files notes that the individual who completed the audit checklist was qualified and independent. Calculations performed for input into the materials balance reports were performed by an independent individual. The only role of the Special Nuclear Materials manager in Audit 08-A-009 was to review and approve the final audit report. The auditors when conducting audits used approved checklists. The inspector confirmed that the audit team personnel were qualified, were authorized by the licensee to perform the audits or surveillances in the areas audited, and the audits and surveillances conducted by the audit team had been conducted in a timely manner.

c. Conclusion

Audits conducted in 2006 –2008 addressed all facility activities required to be audited. All auditors satisfied the qualification requirements.

2 Decommissioning Performance and Status Review (IP 71801)

2.1 Inspection Scope

The inspector interviewed personnel, reviewed selected documents, and toured portions of the site to observe decommissioning work activities including housekeeping, safety practices, fire protection practices, and radiological controls.

2.2 Observations and Findings

The inspector conducted tours of the reactor, auxiliary, spent fuel, turbine and Interim Onsite Storage buildings (IOSBs) and observed decommissioning activities in progress by the licensee at the time of the inspection. Decommissioning work observed by the inspector during the site tour was being conducted in a safe and orderly manner. The inspector observed radiological controls utilized by the licensee, including postings and barriers, and noted that each was functional and in place.

During the inspection and site tour, the inspector noted, that the licensee had completed remediation of the reactor building contaminated liner surfaces. The licensee informed the inspector that they still plan to remove a 12-foot section of liner plate and the activated concrete below the liner plate where the reactor vessel had resided. The inspector in the site tour observed that all polar crane rail supports had been remediated.

The inspector also noted that the auxiliary building had been remediated and all surveys including the final status surveys for each room had been completed. All remediation and final status surveys had been performed in the turbine building. In the spent fuel building, remediation and final status surveys had been completed. However, the licensee plans on conducting additional confirmatory surveys in this building and projects completion or all survey activities by January 16, 2008.

As of December 11, 2008, the licensee had completed final status surveys on 306 of a projected 320 survey units. The number of projected survey units had changed since the last inspection as the licensee had elected to split some of the survey units into multiple units. This completion of 306 survey units constituted approximately 96 % of the total number of projected survey units. The licensee estimated that it would complete remediation and final status surveys of the site by February 9, 2009. The submittal of the last set of final status surveys is estimated to occur within two weeks after the final status survey has been completed by the licensee.

2.3 Conclusion

The licensee continued to remediate contaminated surfaces in a safe manner. Final status surveys had been completed on 306 of a projected 320 survey units constituting completion of approximately 96 % of the projected survey units.

3 Inspection of Final Surveys (IP 83801)

3.1 Inspection Scope

Oak Ridge Institute for Science and Education (ORISE) performed independent confirmatory radiological measurements on surfaces of the spent fuel building.

3.2 Observations and Findings

On April 12, 2006, the licensee submitted their License Termination Plan (LTP) to the NRC. This LTP included proposed designed derived concentration guidelines (DCGL) for meeting the public dose limits after license termination. On November 27, 2007, the NRC issued License Amendment Number 133 that approved the licensee's LTP and the respective DCGL.

Representatives from ORISE, working as the NRC's contractor, reviewed records of final status surveys taken in the auxiliary, spent fuel, reactor and the turbine buildings and imbedded piping in these facilities. At the NRC's request, ORISE personnel conducted independent confirmatory radiological measurements of selected locations in the auxiliary, spent fuel, reactor and the turbine buildings and imbedded piping in these facilities and compared their survey results with the licensee's survey results. The results of surveys taken by ORISE of final status surveys will be reported to the licensee at a later date under separate correspondence.

3.3 Conclusion

The ORISE staff conducted confirmatory measurements on selected surfaces of the auxiliary, spent fuel, reactor and the turbine buildings and imbedded piping in these facilities. The results of the ORISE surveys conducted during this inspection will be reported to the licensee at a later date.

4. Solid Radwaste Management and Transportation of Radioactive Materials (IP 86750)

4.1 Audits and Surveillances

a. Inspection Scope

The inspector reviewed the audits and surveillances made by the licensee of the solid radwaste management and transportation of radioactive materials programs.

b. Observations and Findings

The inspector reviewed audit report 08-A-07, Process Control Program for Processing, and Packaging Liquid Radioactive Waste and Packaging and Transportation of Radioactive Material. No quality assurance problems were identified by this audit. The inspector confirmed that the auditors were independent of the areas being audited; had used approved checklists when conducting audits; were qualified to conduct the audits; were authorized by the licensee to perform audits in the areas audited; and the audits were conducted in a timely manner.

As of the date of this inspection, 24 audit surveillances had been conducted by the licensee with 17 being related to radioactive waste shipments and disposal or processing site visits. The inspector selected six audit surveillance reports for review: 08-S-15, 08-S-16, 08-S-017, 08-S-018, 08-S-20, and 08-S-23. None of the surveillance reports reviewed by the inspector identified any problems or made any recommendations for program improvement.

c. Conclusions

Audits and surveillances of the transportation of radioactive materials were performance-based and were determined by the inspector to be complete. The overall quality and number of the audits and surveillances met the NRC's expectations.

4.2 Changes in the programs

a. Inspection Scope

The inspector interviewed cognizant personnel and reviewed selected documents to determine if any major changes had occurred since the last inspection in the solid waste management and transportation of radioactive materials program. Areas reviewed during the inspection included organization, personnel, facilities, equipment, programs, and procedures.

b. Observations and Findings

The inspector noted that the Radwaste Technical Analyst was no longer identified as part of the organization. At the time of the inspection, the staffing of the solid waste management and transportation of radioactive materials program consisted of the Principal Radiological Engineer, two assigned Radiation Protection Technicians, and two Waste Handlers. Procedure RP.309, Radwaste Control Manual, was declared void by the licensee on August 7, 2008. This procedure, when active, included description of the licensee training program for implementing the requirements for 10 CFR 49 Part 172 Subpart H training required by the U. S. Department of Transportation. Although the specific description of the licensees training program was not required the licensee elected to reestablish this training program description in procedure RP.309.V.01, Decommissioning Division Personnel Training. Revision 1 of procedure RP. 309.V.01, incorporates the description of the training for individuals who are associated with the activities necessary for the transport of

radioactive materials and was issued by the licensee on October 30, 2008. No additional changes to the solid waste management and transportation of radioactive materials program had occurred since the last inspection. The inspector, after reviewing the changes, concluded that the changes made 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.

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.

4.3 Training

a. Inspection Scope

The inspector interviewed cognizant personnel and reviewed selected documents to determine if all personnel involved in the transfer, packaging and transport of radioactive waste and transportation of other radioactive materials had received initial training and periodic retraining, where applicable. The instruction required for these employees, include training in the U.S. Department of Transportation and NRC regulatory requirements, the requirements specified in the waste burial license, and the instructions and operating procedures for transferring, packaging, and transporting radioactive materials.

b. Observations and Findings

All the workers involved in the transfer, packaging and transport of radioactive waste and other radioactive materials had received the required initial training and retraining, if applicable.

c. Conclusions

The inspector confirmed that personnel involved in the transfer, packaging, and transport of radioactive waste and transportation of other radioactive materials had received initial training and periodic retraining. The instruction completed by the cognizant personnel included training in the U.S. Department of Transportation and NRC regulatory requirements, the requirements specified in the waste burial license, and the instructions and operating procedures for transferring, packaging, and transporting radioactive materials.

4.4 Implementation of the Solid Radioactive Waste Program

a. Inspection Scope

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

b. Observations and Findings

The licensee maintained paper copies of the applicable regulation and also had access to electronic copies of the NRC, U.S. Department of Transportation, and the States of South Carolina, Tennessee, and Utah regulations. The inspector confirmed that the licensee had copies of the radioactive materials licenses for all recipients of radioactive materials shipped from the site since this area was last inspected in 2007.

In December 2007, the licensee received a Notice of Violation from the State of Utah regarding a radioactive waste rail shipment from the licensee to a low-level waste disposal site in Utah. This violation was related to the incident on November 26, 2007, when a gondola railcar arrived at the disposal site with a small breach on the sidewall. The Notice of Violation issued by the State of Utah noted that a pipe in the gondola was not adequately blocked and brace such that when the railcar was "humped" the pipe penetrated the side of the gondola. The waste disposal site determined that there was no removable contamination detected on the breach and there was no release of radioactive materials. The failure of the licensee to properly block and brace the pipe so that it could not change position during conditions normally incident to transportation is a violation of U. S. Department of Transportation regulation 49 CFR 177.842(d). This non-repetitive, licensee corrected failure satisfies the criteria as a non-cited violation (NCV 050-00312/0804-01).

On December 8, 2008, the inspector observed portions of the visual inspections conducted by the licensee of waste containers stored in the IOSB. These waste containers are stored in shielded vaults and contain class B and C waste. The licensee in conducting visual inspections followed the requirements outlined in Section 6.5, Container Inspections, of Radwaste Control Manual procedure RP.309.IV.01, IOS Building Operations, revision 5. The licensee informed the inspector that they were testing the proposed changes to this section of the procedure and the procedure, when approved, would be come revision 6. These changes to the procedures included the need for additional records for the stored waste containers, changes in inspection frequencies to maintain consistency with industry standards, and the additional details that must be addressed when conducting visual inspections.

c. Conclusions

A violation of 49 CFR 177.842(d) was identified related to the failure to properly block and brace a pipe in gondola. The pipe penetrated the side of the gondola when the rail car was "humped." In accordance with NRC guidance, this non-repetitive, licensee corrected violation is documented as a non-cited violation. The licensee had maintained copies of the applicable regulations and the licenses of the recipients of radioactive materials that were shipped from the site. The inspector observed portions of the visual inspections of waste containers stored in the IOSB.

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

a. Inspection Scope

The inspector reviewed the shipping records of radioactive materials shipments made from the site.

b. Observations and Findings

As of December 9, 2008, 97 shipments of radioactive materials had been made in 2008. In 2007, the licensee made 191 shipments of radioactive materials. In addition the licensee's contractor responsible for the reactor building concrete and steel removal project had made 96 shipments in 2007, and 97 shipments in 2008. The inspector selected the records of 10 shipments to review, 07-180, 07-188, 08-063, 08-077, 08-087, ES07-067, ES07-093, ES08-100, ES08-149 and ES08-190. Each shipping record reviewed by the inspector included a copy, as applicable, of the radiological surveys conducted by the licensee's staff, NRC Form 540, Uniform Low-Level Radioactive Waste Manifest for each shipment, emergency response information as required, instructions provided to the carrier for maintenance and control of a exclusive use shipment, and a special nuclear material exemption certificate. The emergency response number listed on the waste manifest was confirmed by the inspector as the telephone number used by the Rancho Seco secondary alarm station. An authorized licensee representative signed documents requiring shipper certification. The inspector confirmed that the individuals involved with these shipments had received the appropriate training required by 49 CFR 172, Subpart H. The inspector noted several minor documentation errors, such as incorrect manifest number or not maintaining copies of the waste classification calculations. The licensee opened problem report PDQ 08-19 to evaluate and correct these minor errors.

A NOV was issued by the State of Utah in December 2007. This NOV is discussed on Section 4.4 b above.

c. Conclusions

The licensee had implemented a transportation program for radioactive materials in accordance with NRC and the Department of Transportation regulations.

5 **Exit Meeting Summary**

On December 10, 2008, the inspector briefed the Superintendent, Rancho Seco Assets and other members of licensee staff regarding the preliminary inspection findings. The licensee did not identify any information provided to, or reviewed by, the inspector as proprietary.

PARTIAL LIST OF PERSONS CONTACTED

Sacramento Municipal Utility District

M. Bua, Radiation Protection/Chemistry Superintendent
R. Decker, Lead Final Status Surveys Engineer
J. Field, Engineering Superintendent
W. Hawley, Dismantlement Superintendent - Operations
L. Hoist, Nuclear Document Control Supervisor
R. Jones, Supervising Quality Engineer
M. Murdock, Field Oversight Decontamination Engineer
S. Nicolls, Radiation Health Supervisor
S. Redeker, former Manager, Plant Closure and Decommissioning
E. Ronningen, Superintendent Rancho Seco Assets

INSPECTION PROCEDURES USED

IP 40801	Self-assessment, Auditing, and Corrective Action
IP 71801	Decommissioning Performance and Status Review
IP 83801	Inspections of Final Surveys
IP 86750	Solid Radwaste Management and Transportation of Radioactive Materials

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

050-00312/0804-01 NCV Failure to properly block and brace a pipe in a radioactive materials shipment.

Closed

050-00312/0804-01 NCV Failure to properly block and brace a pipe in a radioactive materials shipment.

Discussed

None

LIST OF ACRONYMS

CAP	Corrective Action Program
CMRG	Commitment Management Review Group
DCGLs	Derived Concentration Guide Lines
DQ	Deviation from Quality
IOSB	Interim Onsite Storage Building
LTP	License Termination Plan
PDQ	Potential Deviation from Quality
ORISE	Oak Ridge Institute for Science and Education
QA	Quality Assurance
RSAP	Rancho Seco Administrative Procedure
RSQM	Rancho Seco Quality Manual