

May 20, 2010

MEMORANDUM TO: File

FROM: John B. Hickman, Project Manager */RA/*
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

SUBJECT: BASIS FOR CATEGORICAL EXCLUSION FROM NATIONAL
ENVIRONMENTAL POLICY ACT ANALYSIS OF HUMBOLDT BAY
POWER PLANT UNIT 3 AMENDMENT RE: DELETION OF FUEL
STORAGE POOL LINER WATER LEVEL

By letter dated April 9, 2010, as supplemented May 7, 2010, Pacific Gas and Electric Company (PG&E, the licensee) submitted to the U.S. Nuclear Regulatory Commission (NRC), a request to delete Technical Specification (TS) 3.1.3, "Fuel Storage Pool Liner Water Level." These changes were based on the completion of the transfer of spent nuclear fuel assemblies and fuel fragment containers (spent fuel) from the Spent Fuel Pool (SFP) to the Humboldt Bay Independent Spent Fuel Storage Installation.

A stainless steel liner covering the inside surface of the fuel storage pool was installed in 1963 because of high chloride concentrations in the pool that were suspected to be from groundwater in-leakage. The liner formed a nominal one quarter-inch gap between the walls and floor of the pool and the liner. It was discovered in March of 1966 that a leak had developed in the fuel storage pool liner and that the leakage was from the fuel storage pool to the gap, and then through the structural concrete to the adjacent groundwater. TS 3.1.3 was implemented to require that the water level in the gap be maintained below the fuel storage pool water level and below the exterior groundwater level to preclude both pool leakage to the surrounding groundwater and groundwater leakage into the pool. The licensee proposed to delete TS 3.1.3, based on an analysis that demonstrated that the potential offsite dose from pool leakage, with the spent fuel removed, was inconsequential. Additional conforming and administrative changes were also proposed.

10 CFR 51.22 provides criterion for categorical exclusion and identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review. In particular, section (c) states: The following categories of actions are included as categorical exclusions:

(9) Issuance of an amendment to a permit or license for a reactor under part 50 or part 52 of this chapter, which changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in part 20 of this chapter, or which changes an inspection or a surveillance requirement, provided that - (i) The amendment involves no significant hazards consideration; (ii) There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite; and (iii) There is no significant increase in individual or cumulative occupational radiation exposure.

and

(10) Issuance of an amendment to a permit or license under parts 30, 31, 32, 33, 34, 35, 36, 39, 40, 50, 52, 60, 61, 63, 70, or part 72 of this chapter which - (ii) Changes recordkeeping, reporting, or administrative procedures or requirements.

Humboldt Bay is a 10 CFR Part 50 licensed, permanently shut-down reactor. The SFP liner was installed to prevent/minimize leakage from the pool to the environment. As part of that functional purpose the water level in the gap was maintained at a level below both the pool and groundwater. The liner and the associated gap water level constitute a facility component designed to minimize offsite leakage. The liner is located in a radiologically controlled area of the site and is therefore within the restricted area, as defined in 10 CFR Part 20. Based on the removal of the spent fuel from the SFP the licensee performed an analysis which demonstrated that there was no significant hazards, or significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or significant increase in individual or cumulative occupational radiation exposure, if the pool were to leak to the environment with no credit taken for the liner or liner gap. Based on the above, the licensee's proposed amendment to delete the TS for the SFP liner water level meets categorical exclusion (c)(9).

The licensee's other proposed changes delete TS which have no applicability with the deletion of TS 3.1.3, or correct typographical errors. These changes are administrative and meet categorical exclusion (10)(ii).

Based on the above, the licensee's proposed amendment to the TS meets the categorical exclusion provisions of 10 CFR 51.22, and an Environmental Assessment is not required.

Docket No.: 50-133

(9) Issuance of an amendment to a permit or license for a reactor under part 50 or part 52 of this chapter, which changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in part 20 of this chapter, or which changes an inspection or a surveillance requirement, provided that - (i) The amendment involves no significant hazards consideration; (ii) There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite; and (iii) There is no significant increase in individual or cumulative occupational radiation exposure.

and

(10) Issuance of an amendment to a permit or license under parts 30, 31, 32, 33, 34, 35, 36, 39, 40, 50, 52, 60, 61, 63, 70, or part 72 of this chapter which - ... (ii) Changes recordkeeping, reporting, or administrative procedures or requirements.

Humboldt Bay is a 10 CFR Part 50 licensed, permanently shut-down reactor. The SFP liner was installed to prevent / minimize leakage from the pool to the environment. As part of that functional purpose the water level in the gap was maintained at a level below both the pool and groundwater. The liner and the associated gap water level constitute a facility component designed to minimize offsite leakage. The liner is located in a radiologically controlled area of the site and is therefore within the restricted area, as defined in 10 CFR Part 20. Based on the removal of the spent fuel from the SFP the licensee performed an analysis which demonstrated that there was no significant hazards consideration, or significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or significant increase in individual or cumulative occupational radiation exposure, if the pool were to leak to the environment with no credit taken for the liner or liner gap. Based on the above, the licensee's proposed amendment to delete the TS for the SFP liner water level meets categorical exclusion (c)(9).

The licensee other proposed changes delete TS which have no applicability with the deletion of TS 3.1.3, or correct typographical errors. These changes are administrative and meet categorical exclusion (10)(ii).

Based on the above, the licensees proposed amendment to the TS meets the categorical exclusion provisions of 10 CFR 51.22, and an Environmental Assessment is not required.

Docket No.: 50-133

DISTRIBUTION:

DCD R/F

OGC (A. Pessin)

JHickman

ML101340176

OFFICE	DWMEP	DWMEP/LA	DWMEP
NAME	JHickman	CHolston	BWatson (A)
DATE	5/19 /2010	5/19/2010	5/20/2010

OFFICIAL RECORD COPY