Hickman, John

From: Sokolsky, David [DDS2@PGE.COM]
Sent: Friday, September 17, 2010 4:06 PM
To: Hickman, John
Cc: Roller, Paul James; Rod, Kerry; Albers, John P; Snyder, Robert A; Newey, John; Griffin, John J; Baldwin, Thomas (DCPP); Chad Hyslop
Subject: HBPP RESPONSE TO QUESTION 2
Attachments: RCP-6Q Rev 0.doc; HBPP-SS-001final.doc; Scan ALs.doc

John,

Below is NRC Question 2, PG&E's response provided at the July 29, 2010 meeting, and additional response information:

2. NRC Question: How do you plan to verify the concentrations in the waste prior to shipment?

July 29 Meeting Response: Units 1 and 2 material will be surveyed under a MARSAME protocol with results from individual surface contamination surveys used to calculate the volume concentrations for each shipment. Unit 3 waste will be characterized by gamma analysis samples and scaled for other nuclides from offsite analysis.

Additional Response: The MARSAME process is proceduralized in HBPP Procedure RCP-6Q "MARSAME Disposition of Materials and Equipment"
(attached to this email). This process will be used for Unit 1&2 waste.
A sample survey package implementing the procedure, "HBPP-SS-001" is also attached to this email. A document, Scan Action Limits (ALs), describing the development of the action limits is also attached to this email. The ratios from the action limits will be used within the radwaste procedures to quantify the waste prior to shipment.

Unit 3 waste will be quantified using current radwaste procedures, gamma analysis, dose-to-curie and standard wastestream ratios for hard-to-detect nuclides.

Let me know if this information is sufficient for the NRC to complete review of our exemption request, or if you need additional information or clarification. Thank you.

David Sokolsky
Supervisor of Licensing
Humboldt Bay Power Plant
(707)444-0801 office
(707)601-6703 cell

-----Original Message-----
From: Hickman, John [mailto:John.Hickman@nrc.gov]
Sent: Thursday, September 09, 2010 10:41 AM
To: Sokolsky, David
Subject: RE: HBPP RESPONSE TO QUESTION 1

Dave,

Karen is just about finished up with her writeup so I should get the SE by next week. One item she would like some record of is your response to question 2. You stated below that the question was resolved during the meeting, but she would like some sort of written documentation of the answer. An e-mail documenting the answer would be fine.

Thanks,
John

-----Original Message-----
From: Sokolsky, David [mailto:DDS2@PGE.COM]
Sent: Wednesday, August 11, 2010 5:36 PM
To: Hickman, John
Cc: Roller, Paul James; Newey, John; Albers, John P; Baldwin, Thomas (DCPP); Rod, Kerry; Snyder, Robert A; Chad Hyslop; Griffin, John J
Subject: HBPP RESPONSE TO QUESTION 1

John,

The attached file is the Radiological Characterization Report developed for HBPP by Enercon, dated November 21, 2008, and responds to NRC Question 1 (concentrations expected in the waste) from your July 16, 2010 email to me, as discussed during our July 29, 2010 public meeting for the HBPP Alternate Disposal Exemption Request dated April 1, 2010.
In particular, reference to GEL laboratory reports are contained in Table 4-7 (page 40) and Table 4-9 (page 46).

It should be noted that surveys of highly impacted areas (much of Unit 3) do not apply to waste to be shipped under the exemption request.

Also, positive gross alpha results for Units I and 2 are naturally occurring nuclides in materials or lead paint. GEL results for fuel oil tank waste (previously shipped as non-radioactive) show this is the case. The contamination of the above ground structures of Units1/2 occurred from gaseous decay of Xe-137 to Cs-137 released from Unit 3 during operations from 1963 to 1976.

This is the final email that responds to NRC questions. Previous emails responded to NRC Questions 3, 5 and 6. PG&E will respond to NRC Question 9 in a letter submittal shortly. NRC Questions 2, 4, 7 and 8 were resolved during the July 29 public meeting.

David Sokolsky
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