



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

September 28, 2010

Mr. John T. Conway
Senior Vice President-Energy Supply
& Chief Nuclear Officer
Pacific Gas and Electric Company
P.O. Box 3
Mail Code 104/6/601
Avila Beach, California 93424

SUBJECT: NRC INSPECTION REPORT 050-00133/10-004

Dear Mr. Conway:

This refers to the inspection conducted from August 30-September 2, 2010, at the Humboldt Bay Power Plant, Unit 3 facility, in Eureka, California. The enclosed report presents the results of this inspection. 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. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violation involves your loss of a radioactive check source. This violation is being treated as a Non-Cited 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 the 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 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; and (2) the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

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 for the NRC's documents system (ADAMS), accessible from the NRC's Web site at [HTTP://www.nrc.gov/reading-rm/adams.html](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 Mr. Robert Evans, Senior Health Physicist, at (817) 860-8234 or the undersigned at (817) 860-8191.

Sincerely,



D. Blair Spitzberg, PhD, Chief
Repository & Spent Fuel Safety Branch

Docket: 050-00133

License: DPR-7

Enclosure: NRC Inspection Report 050-00133/10-004

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- 4 -

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U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket: 050-00133
License: DPR-7
Report: 050-00133/10-004
Licensee: Pacific Gas and Electric Company
Facility: Humboldt Bay Power Plant, Unit 3
Location: 1000 King Salmon Avenue
Eureka, California 95503
Dates: August 30-September 2, 2010
Inspector: Robert Evans, PE, CHP, Senior Health Physicist
Repository & Spent Fuel Safety Branch
Approved by: D. Blair Spitzberg, PhD, Chief
Repository & Spent Fuel Safety Branch
Attachment: Supplemental Inspection Information

ENCLOSURE

EXECUTIVE SUMMARY

Humboldt Bay Power Plant, Unit 3
NRC Inspection Report 050-00133/10-004

This inspection was a routine, announced inspection of decommissioning activities being conducted at the Humboldt Bay Power Plant, Unit 3 facility. In summary, the licensee was conducting site activities in compliance with regulatory and license requirements, with one exception described below.

Organization, Management, and Cost Controls

- The organizational structure was in agreement with Quality Assurance Plan requirements. A sufficient number of staff members were available for the decommissioning activities in progress. Routine technical reviews were being conducted as required by the Quality Assurance Plan and site procedures. The licensee continued to implement the Request for Information work control process that may help reduce worker errors in the field (Section 1).

Safety Reviews, Design Changes, and Modifications

- The licensee's safety review program was conducted in compliance with 10 CFR 50.59 and Quality Assurance Plan requirements (Section 2).

Maintenance and Surveillance

- The licensee conducted maintenance and surveillance activities in accordance with approved site procedures (Section 3).

Decommissioning Performance and Status Review

- The licensee conducted decommissioning activities in accordance with license and regulatory requirements. Site tours confirmed that radioactive postings and boundaries were being maintained in accordance with regulatory requirements. The licensee spilled some radioactive liquid as a result of a valve lineup error. The spilled liquid remained within the restricted area and was recovered by the licensee on the same day. The licensee issued a non-conformance report to determine the root cause of the spill event. The licensee continued to implement the cross contamination and monitoring plan in accordance with license requirements. The licensee recently reported a lost check source to the NRC. The licensee's loss of this radioactive material was a Non-Cited Violation of regulatory requirements (Section 4).

Solid Radioactive Waste Management and Transportation of Radioactive Materials

- The licensee conducted radwaste handling and transportation activities in accordance with procedure and regulatory requirements (Section 5).

Report Details

Summary of Plant Status

The licensee commenced with active decommissioning of the Humboldt Bay Power Plant, Unit 3 facility, during May 2009. Since the previous inspection, the licensee permanently removed selected plant components from service including the gas treatment system. The licensee also recently removed all 32 control rod drive blades from within the reactor pressure vessel (RPV). The control rod drive blades were being temporarily stored in the spent fuel pool (SFP) pending removal of the highly radioactive stellite alloy material from the blades.

During the 1990's, a contractor for the licensee conducted an activation analysis of the RPV and its internals. During this inspection, the licensee was conducting radiological surveys of the RPV, in part, to confirm the conclusions of the previous activation analysis and to confirm the disposal classification. Beginning in March 2011, a contractor for the licensee plans to remove all material from the RPV that does not meet the criteria for Class A disposal. The licensee also plans to remove the highly radioactive components from within the RPV that exceed the radiation level allowed for shipment of the RPV as low-level radioactive material in accordance with 10 CFR 71.14.

The licensee was preparing Unit 3 for transition to "cold and dark" decommissioning operations. This mode of decommissioning requires that all components within the work area be supplied with temporary power, water, and air. To support "cold and dark" operations, the licensee was in the process of installing alternate power supplies including temporary transformers. Other work in progress included decommissioning of the shutdown heat exchangers, main turbine, condenser, and the interconnected piping and valves.

The licensee continued to test a new natural-gas fired power generation plant located adjacent to Unit 3. Following the completion of preoperational testing of the new power plant, the licensee plans to commence with decommissioning of the two fossil units, Units 1 and 2. The licensee plans to permanently shut down Units 1 and 2 during late September or early October 2010. Demolition of Units 1 and 2 is expected to commence during late-2010 or early 2011.

The licensee has almost completed the construction of two new truck monitor stations that will be used to radiologically monitor the trucks that will be hauling building rubble from Units 1 and 2 to the disposal facility. These monitors will help ensure that the building debris meets the criteria for alternate disposal. The monitors were being calibration checked during the inspection. The truck monitors will be placed into service in the near future.

1 Organization, Management, and Cost Controls (36801)

1.1 Inspection Scope

The inspector reviewed management organization and controls to ensure that the licensee was maintaining effective oversight of decommissioning activities.

1.2 Observations and Findings

The organizational requirements are specified in the Humboldt Bay Quality Assurance (QA) Plan. The inspector reviewed the licensee's organizational structure for compliance with QA Plan requirements. The licensee had staffed all management

positions, and the licensee appeared to have sufficient staff for all work activities in progress. In summary, the organization in place at the time of the inspection complied with QA Plan requirements.

Since the previous inspection, the licensee revised the QA Plan, in part, to change the formal responsibilities for technical reviews. The licensee removed the responsibilities of the Plant Staff Review Committee (PSRC) from the QA Plan, although the PSRC was still required by the Defueled Safety Analysis Report and site procedures. Some of the review functions previously performed by the PSRC were transferred to the Nuclear Safety Oversight Committee (NSOC) and to Independent Safety Reviewers. Independent Safety Reviewers were staff members who were qualified to perform selected reviews such as procedure revisions. The inspector reviewed the records of the various review groups, including meeting minutes, and discussed the conclusions of the groups with committee members.

The PSRC performed reviews of work tasks with an emphasis on As Low As Reasonably Achievable (ALARA) controls. The PSRC was also responsible for review of the site emergency plan. The PSRC is required to meet at least quarterly and at other times at the discretion of the chairman. The committee met numerous times during 2010, and the meetings were a combination of regular and special sessions. The inspector concluded that the licensee's PSRC functioned in accordance with Defueled Safety Analysis Report and procedure requirements.

As described in the QA Plan, the NSOC was required to perform independent reviews of: changes, tests, experiments and procedures; reportable events; plant trends; and violations of regulatory and license requirements. The NSOC was required to meet at least quarterly. The inspector reviewed the meeting minutes for 2010 and noted that the committee discussed relevant topics during the meetings.

The inspector reviewed portions of the licensee's work control processes to ensure that decommissioning work was being conducted in accordance with site procedures. Administrative Procedure HBAP C-45, Work Control Process, delineates the work control process for Unit 3 decommissioning. This procedure includes the Request for Information (RFI) process. The RFI process allows workers to request clarification or additional information associated with work orders. In recent months, the licensee promoted the RFI process as a mechanism for workers to use when encountering an unknown situation in the field. The RFI process was implemented to help reduce the number of human errors in the field.

The inspector reviewed the RFI process including the licensee's trending of RFIs. During the previous inspection, the licensee's records indicated that the RFI process was extensively used during the January-February 2010 time frame, but it was not clear if this trend was continuing. During this inspection, the inspector determined that the RFI process continued to be used by decommissioning workers. Since January 2010, about 250 RFIs had been generated, averaging about one per day. At the time of this inspection, only nine RFIs remained open, indicating that the licensee's representatives were effectively responding to the RFIs. In summary, the licensee continued to effectively use the RFI process in accordance with procedure requirements.

1.3 Conclusions

The organizational structure was in agreement with QA Plan requirements. A sufficient number of staff members were available for the decommissioning activities in progress. Routine technical reviews were being conducted as required by the QA Plan and site procedures. The licensee continued to implement the RFI work control process that may help reduce worker errors in the field.

2 **Safety Reviews, Design Changes, and Modifications (37801)**

2.1 Inspection Scope

The inspector conducted reviews of the licensee's design change process to verify compliance with the requirements of 10 CFR 50.59.

2.2 Observations and Findings

The licensee conducted its last 10 CFR 50.59 safety evaluation during 2009, prior to the period covered by this inspection. This safety evaluation eliminated the SFP rupture scenario from the Defueled Safety Analysis Report. During this inspection, the inspector reviewed the proposed changes that were screened by the licensee for a full safety evaluation. The proposed changes included permanent removal of selected systems no longer required to support plant operations including the standby gas treatment system. The proposed changes also included plant modifications necessary to support de-energizing all permanent plant systems so the licensee can commence with the decommissioning of these systems. For example, the changes include installation of temporary power, fire water, instrument air, and ventilation to support future "cold and dark" decommissioning work. In summary, the inspector concluded that the licensee had correctly screened these change documents against the criteria established in 10 CFR 50.59.

The Offsite Dose Calculation Manual provides the instructions for calculating offsite doses resulting from radioactive gaseous and liquid effluents, for calculating monitoring alarm and trip setpoints, and for conducting the radiological environmental monitoring program. During the inspection, the licensee's representatives stated that the Manual would have to be revised because of a significant change in plant conditions. In the near future, the licensee plans to discontinue operation of the two fossil fueled power plants which will eliminate the dilution flow used for liquid radwaste discharges. Currently, liquid wastes are discharged through the discharge canal using dilution flow from the Units 1 and 2 circulating water systems. Instead of using plant discharge flow, the licensee plans to use tidal volume as the dilution volume. The proposed change still has to be independently reviewed in accordance with the QA Plan prior to implementation. Also, in accordance with the QA Plan, the licensee has to report the changes to the NRC in the annual radioactive effluent release report. The NRC will review the implementation of this proposed change to the Offsite Dose Calculation Manual during a future inspection.

2.3 Conclusions

The licensee's safety review program was conducted in compliance with 10 CFR 50.59 and QA Plan requirements.

3 Maintenance and Surveillance (62801)

3.1 Inspection Scope

The inspector conducted a review of the equipment that remained in service to support plant operations, and the inspector observed the performance of selected maintenance and surveillance activities.

3.2 Observations and Findings

At the time of the inspection, the licensee continued to maintain selected plant systems including power supply, fire water, instrument air, and water supply systems. The inspector compared selected operating parameters to the limits specified in site procedures. All parameters reviewed by the inspector were found to be within the allowed range. In summary, the licensee operated the remaining equipment in accordance with procedure requirements.

The licensee continued to conduct surveillance tests on selected plant components. The inspector observed the performance of one surveillance procedure during the inspection. Procedure STP 3.6.11, Annual Calibration of Spent Fuel Pool Liner Level Instruments, described the instructions necessary to calibrate the SFP liner level monitors and to verify the high and low level set-points. Although the procedure lacked details, the procedure was conducted by two technicians who supplemented the procedure with "skill of the craft" knowledge. The equipment passed the annual calibration checks with no equipment failures. During the onsite inspection, the licensee decided that the procedure was no longer necessary because the SFP liner level requirements had been removed from technical specifications. In summary, the licensee continued to schedule and to conduct surveillance tests as required by plant procedures.

3.3 Conclusions

The licensee conducted maintenance and surveillance activities in accordance with approved site procedures.

4 Decommissioning Performance and Status Review (71801)

4.1 Inspection Scope

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

4.2 Observations and Findings

a. Site Tours

The inspector toured the radiologically restricted areas of the facility. Radiological postings were clearly visible, and postings met the requirements of 10 CFR Part 20. Housekeeping was being controlled in all areas. During site tours, the inspector conducted radiological surveys to verify the accuracy of radiation area postings using a Ludlum Model 2401-EC2 survey meter (NRC No. 016294G, calibrated due date of

01/04/11). The inspector did not identify any radiation area that was incorrectly posted by the licensee.

b. Review of Decommissioning Activities

The critical path work involves the radiological characterization of the RPV. To support work within the RPV, the licensee added water to the RPV during March 2010. The water was added, in part, to provide radiation shielding for workers. However, the water in the RPV subsequently became murky and radioactive. In response to the poor water clarity and elevated radioactivity level, the licensee elected to connect a reactor vessel water recirculation and cleanup system to the RPV. The system consisted of piping, tubing, pumps and a filtration unit. The system was placed into service during June 2010.

The inspector compared system operation to the requirements specified in the operating procedure. The system was aligned according to procedure requirements. In addition, the inspector reviewed the effectiveness of the system in reducing the radioactivity of the water. The primary radionuclide of concern was cobalt-60. Based on water sampling conducted before and after system installation, the cleanup system reduced the cobalt-60 radioactivity by a factor of 500. The licensee's approved design permitted the addition of chemicals to the RPV water to help reduce the amount of iron in the water. However, the cleanup system effectively increased water clarity without the need for chemicals.

Just prior to the onsite inspection, the licensee removed the 32 control rod blades from the RPV. The work was conducted during July-August 2010 in accordance with a work order and temporary procedure. The work was inspected and observed by the licensee's quality control supervisor. During the onsite inspection, the licensee removed most of the control rod blade chocks from the RPV. The chocks were previously used to help keep the control rod blades in place within the reactor core. The inspector noted that the work was well controlled by the licensee's staff. Industrial safety and radiation protection controls were evident throughout the work activity.

During recent months, the licensee experienced problems with leaks originating in inaccessible portions of underground service tunnels. Some of the leaks may be the result of the January 9, 2010, earthquake, but the leaks may also be the result of pile-driving work being conducted at the new power generation facility. The inspector reviewed the licensee's current plans for locating and repairing these leaks. The licensee plans to start the tunnel leak repair work during October 2010. To support this work, the licensee will install dedicated ventilation and crane support systems. The leaks are suspected to originate from the area where the liquid radwaste building connects to the tunnel, so the licensee plans to concentrate their early efforts at this location. If the leaks are not easily located, then the licensee plans to conduct decommissioning within the tunnels as it continues to search for the tunnel leaks. The decommissioning work will consist of the removal of pipes, insulation, electrical cables, and racks located within the tunnels. In addition, the licensee will decommission the concrete surfaces of the tunnels. The inspector compared the proposed work to the instructions provided in the work order. The work order provided sufficient detail for the identification and repair of the tunnel leaks.

The inspector also reviewed the licensee's plans for removal of non-radioactive mercury, a hazardous material, from Unit 3. Mercury was used in plant switches, thermostats, gauges, manometers, and capillary tubes. The licensee created a work order for the removal of mercury wastes from Unit 3. As part of the removal process, the licensee will attempt to segregate the mercury from radioactive contamination to reduce its disposal volume. Mercury removal work commenced during July 2010. At the time of the inspection, the licensee had identified 50 items that contained mercury, and four items had been physically removed from the plant. The licensee is expected to add additional items to the list as they are identified in the plant. The inspector concluded that the licensee was conducting the mercury removal work in accordance with work order instructions.

c. Spill of Radioactive Fluid

On August 21, 2010, the licensee accidentally spilled radioactive liquid inside the restricted area. At that time, the operations staff was preparing to routinely release liquid effluent through the discharge canal in accordance with a site procedure. The operations staff conducted a valve lineup and then started the system in the recirculation mode of operations. The operations staff did not recognize that the valve lineup was incorrect. Specifically, the valves between the liquid radwaste system and the dirty drain header were left open but should have been closed. These valves should have been closed because the dirty drain header piping had been permanently removed from service.

After the valve lineup was completed, the licensee started the liquid radwaste system in recirculation. The dirty drain header piping became pressurized with liquid radwaste fluid, and the pressurized fluid subsequently spilled onto the building floor. The operator immediately recognized the error and secured the liquid radwaste system; however, some of the spilled liquid flowed into the yard drain system. The licensee later estimated that about 70 gallons of fluid had been spilled, but because of the design of the yard drain system, none of the fluid left the restricted area. The yard drain system has a series of sumps and weir walls that are used to collect and retain small volumes of fluid. The spill was captured in one of the sumps and associated weir wall located within the restricted area. The licensee recovered the spilled fluid the same day from the yard drain system. The licensee collected samples from various locations within the yard drain system and concluded that the spilled fluid did not reach the discharge canal. The spill did not meet the criteria for reportability because the volume of the spilled liquid was less than the reporting limit.

The licensee conducted a preliminary investigation just prior to the onsite inspection. The inspector reviewed this event and discussed the event with responsible individuals. Based on preliminary information, the event appeared to be a configuration control problem because the valve lineup was not up-to-date. In response to the event, the licensee issued a SAP notification (the licensee's electronic problem reporting system) to document the problem and to formulate corrective actions. Further, the SAP notification was assigned to the Technical Review Group for independent review. Although the event did not result in any actual safety consequence, the licensee upgraded the event to a non-conformance report. A root cause analysis will be conducted as part of the non-conformance report review. The NRC will conduct a review of the licensee's corrective actions taken in response to this event during a future inspection to ensure

that the licensee incorporates contamination control during future decommissioning activities.

d. Status of Cross Contamination Prevention and Monitoring Plan

License Condition 2.C.4 requires the implementation of the cross contamination prevention and monitoring plan for the new fossil fuel generation facility. The inspector reviewed the licensee's implementation of its cross contamination plan. The licensee continued to conduct the monitoring program in accordance with plan requirements. The most recent quarterly radiological survey was completed during mid-July 2010. No radiological measurements were identified during the survey outside of the normal variations of background.

e. Loss of Radioactive Material

The inspector conducted a follow-up review of the licensee's formal report involving a loss of control of radioactive material. During June 2010, the licensee became aware that it was missing a radioactive check source. The check source was a mixed gamma radiation source used for calibration of gamma detecting meters. The source was identified missing during a routine inventory. The licensee immediately conducted a search for the source but failed to locate the source. The licensee subsequently reported the source as missing by Licensee Event Report to the NRC dated August 20, 2010.

The licensee suspects that the radioactive sealed source may have been accidentally disposed as radioactive waste, or the source may still be present onsite but misplaced. There is also the remote possibility that the source was stolen from the site.

The inspector conducted a review of the licensee's corrective actions taken in response to the missing source. One corrective action was to dispose of all unnecessary sources. The licensee consolidated the remaining sources into fewer cabinets. The cabinets were locked, and stricter key controls were implemented. Also, the source checkout process was revised to further control the sources that are removed from the cabinets. The inspector observed the new cabinets and checkout logs.

The sealed source contained a mixture of gamma-emitting radionuclides. The radionuclide composition consisted of an aggregate quantity of licensed material that was 53 times the quantity specified in 10 CFR 20, Appendix C, a quantity which exceeded the reporting criterion of 10 times the quantity specified in Appendix C. Regulation 10 CFR 20.1802 states that licensees shall control and maintain constant surveillance of license material that is in a controlled or unrestricted area and that is not in storage. The licensee's loss of control of radioactive material that was not in storage was a violation of 10 CFR 20.1802 requirements (NCV 050-00133/1004-01). However, the licensee identified the missing sealed source, notified the NRC about the missing radioactive material, and implemented corrective actions to prevent recurrence of the event. Therefore, this violation is being treated as a Non-Cited Violation (NCV), consistent with Section VI.A and Supplement IV.D.10 of the NRC Enforcement Policy.

4.3 Conclusions

The licensee conducted decommissioning activities in accordance with license and regulatory requirements. Site tours confirmed that radioactive postings and boundaries were being maintained in accordance with regulatory requirements. The licensee spilled some radioactive liquid as a result of a valve lineup error. The spilled liquid remained within the restricted area and was recovered by the licensee on the same day. The licensee issued a non-conformance report to determine the root cause of the spill event. The licensee continued to implement the cross contamination and monitoring plan in accordance with license requirements. The licensee recently reported a lost check source to the NRC. The licensee's loss of this radioactive material was a Non-Cited Violation of regulatory requirements.

5 **Solid Radioactive Waste Management and Transportation of Radioactive Materials (86750)**

5.1 Inspection Scope

The inspector reviewed the licensee's programs for characterizing, packaging, and shipping the radioactive wastes that will be generated during site decommissioning.

5.2 Observations and Findings

The inspector reviewed the licensee's program for handling, packaging, and shipping of radioactive wastes. Radioactive wastes are controlled based on the classification of the wastes. The various classifications include below Class A, Class A, Class B and C, and greater than Class C. The inspector compared the licensee's control of wastes against the requirements specified in several decommissioning documents. In summary, the licensee was handling and storing the various wastes in accordance with these document requirements.

The licensee recently submitted a request to the NRC for alternate disposal of about 200,000 cubic feet of building debris containing very low levels of radioactivity at a Resource Conservation and Recovery Act hazardous material disposal facility located in Idaho. The licensee submitted the request by letter to the NRC dated April 1, 2010, as revised by letter dated August 12, 2010. At the conclusion of the onsite inspection, the NRC was still reviewing the licensee's request to dispose of these below Class A wastes. If approved by the NRC, the licensee plans to dispose of the demolition debris from Units 1 and 2 at this facility in Idaho. The demolition of Units 1 and 2 is expected to commence during late-2010 or early 2011.

The bulk of the waste material being removed from Unit 3 consists of Class A wastes. Class A wastes are typically packaged for shipment almost immediately upon removal from the plant. The licensee shipped these wastes for permanent disposal at a licensed facility located in Utah. The inspector reviewed the licensee's procedures for characterizing and packaging Class A wastes. The waste disposal facility established waste acceptance criteria for disposal. The criteria include the radiation and surface contamination levels that are allowed for disposal of these wastes at the Utah site. The inspector confirmed that the waste acceptance criteria have been incorporated into site procedures. Further, the inspector interviewed various individuals and confirmed that all individuals understood these radiological limits.

The inspector reviewed the licensee's plans for storage and disposal of Class B and C wastes. Class B and C wastes include filter resins, tank sludge, and selected components removed from the RPV. At the time of the inspection, the licensee did not have access to a site that could accept Class B and C wastes for disposal. The resin and sludge material was being stored in tanks located in various areas of the plant. Much of the Class B and C wastes from the RPV were being temporarily stored in the SFP. At some future date, the licensee plans to dispose of these wastes at a licensed disposal facility. In the interim, the licensee may elect to consolidate, package, and store these wastes in a single onsite location. The licensee may also elect to ship the wastes to an out-of-state facility for processing, stabilization, or interim storage.

Greater than Class C wastes cannot be disposed by shallow land burial. Therefore, the licensee plans to package all greater than Class C wastes in a canister for interim storage in the onsite Independent Spent Fuel Storage Installation. The licensee plans to package these wastes at a later date, after the remainder of the greater than Class C wastes have been removed from the RPV.

The inspector also reviewed the licensee's use of fixative paints for control of contamination on equipment being transported for disposal. NRC guidance document NUREG-1608, "Categorizing and Transporting Low Specific Activity Materials and Surface Contamination Objects," states that paints can be used for fixing contamination. In addition, the Utah disposal site's waste acceptance criteria report states that the licensee may apply a fixative to the debris to reduce the removable contamination levels to below the specified limits. In summary, the inspector confirmed that the licensee's use of fixative paint to reduce surface contamination levels for transportation was consistent with NRC guidance.

5.3 Conclusions

The licensee conducted radwaste handling and transportation activities in accordance with procedure and regulatory requirements.

6 **Exit Meeting**

The inspector reviewed the scope and findings of the inspection during an exit meeting that was conducted at the conclusion of the onsite inspection. The licensee did not identify as proprietary any information provided to, or reviewed, by the inspector.

SUPPLEMENTAL INSPECTION INFORMATION

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S. Jones, Quality Assurance Supervisor
P. Roller, Director and Nuclear Plant Manager
B. Sicotti, Quality Control Supervisor
M. Smith, Engineering Manager
R. Snyder, Radwaste Transportation Supervisor
D. Sokolsky, Licensing Supervisor

INSPECTION PROCEDURES USED

IP 36801 Organization, Management, and Cost Controls at Permanently Shutdown Reactors
IP 37801 Safety Reviews, Design Changes, and Modifications at Permanently Shutdown Reactors
IP 62801 Maintenance and Surveillance at Permanently Shutdown Reactors
IP 71801 Decommissioning Performance and Status Review
IP 86750 Solid Radioactive Waste Management and Transportation of Radioactive Materials

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

050-00133/1004-01 NCV Loss of radioactive check source

Closed

050-00133/1004-01 NCV Loss of radioactive check source

Discussed

None

LIST OF ACRONYMS

ALARA	As Low As Reasonably Achievable
CFR	Code of Federal Regulations
IP	NRC Inspection Procedure
NCV	Non-Cited Violation
NSOC	Nuclear Safety Oversight Committee
PSRC	Plant Staff Review Committee
QA	quality assurance
RFI	Request for Information
RPV	reactor pressure vessel
SFP	spent fuel pool