

**From:** Naquin, Tyrone  
**Sent:** Wednesday, October 27, 2010 3:01 PM  
**To:** Ryder, Christopher  
**Cc:** Smith, Brian; Habighorst, Peter  
**Subject:** GE Vallecitos Renewal

GE Vallecitos submittal:

I have completed a review of the Radiation Protection portion of the renewal app, as well as a review of the facility as you requested.

I find the renewal submittal to be more general than the last submittal (1989). It would seem to me that the previously accepted submittal would be the place to start for a renewal, but that does not appear to be the starting point for GE. While not strictly using the 1520 for conducting an acceptance review, the 1520 does look at 9 specific areas. Those are what I looked to find addressed in the renewal app (I supplied regulatory reference):

- 1) Radiation Protection Program (10 CFR Par 20.1101)
- 2) ALARA (Art 1101 (b) & (d))
- 3) Qualified/Trained rad Protection Staff
- 4) Written Procedures/RWPs (Art 1101(b))
- 5) Employee Training (CFR 19.12)
- 6) Airborne contamination control ((Art 1101(d) and 1701)
- 7) Surveys and Monitoring ((art 1501)
- 8) Accident analysis (CFR 70.61)
- 9) Records and Reports (Art 2101 and 2201)

All of these areas were addressed in the renewal submittal. Overall, the submittal was more generic. There were no specific regulatory commitments for any of these areas in the renewal. For example, while surveys and monitoring was addressed, there was no regulatory commitment, such as a commitment to Article 1501 or 1502 of Part 20. The previous submittal referred to those articles specifically. Another example, under Airborne contamination control, there was a reference to NIOSH for equipment and a general compliance reference to 'the applicable parts of 10 CFR Part 20,' but no further detail. The previous submittal mentioned Article 1703 and appendix b & C from Part 20. There were several such instances of this. In the renewal I found only 1 specific instance of regulatory reference, and that was in the employee Training area, where Part 19.12 was referenced. Otherwise, there were only two generic references to 10 CFR Part 20 (the applicable parts) in the whole rad protection section. There were no references to Regulatory guides. My view is that the applicant should provide some regulatory basis for the different areas of their radiation protection program. With that, I could move forward on an Acceptance Review and send RAIs to understand their position.

As for their facility description, the previous submittal was more thorough in it's description of facilities, ventilation, interlocks, etc. than the renewal submittal. Again, I don't know why they elected to start at any other point than the previously acceptable submittal.

I can't complete an acceptance review on this level of commitment. If you need anything else from me, or if I can assist if you have further discussion with GE over the submittal, please let me know.

Ty

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From: Naquin, Tyrone

Created By: Tyrone.Naquin@nrc.gov

Recipients:

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