

Pacific Gas and Electric Company
Humboldt Bay Power Plant
Paul J. Roller
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January 13, 2011

PG&E Letter HBL-11-001
PG&E Letter HIL-11-001



ATTN: Document Control Desk
Director, Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Docket No. 50-133, OL-DPR-7
Humboldt Bay Power Plant, Unit 3
Docket No. 72-27, Materials License No. SNM-2514
Humboldt Bay Independent Spent Fuel Storage Installation
Report of Changes to the Humboldt Bay Site Emergency Plan (Revision 4)

Dear Commissioners and Staff:

Pursuant to 10 CFR 50.4, 10 CFR 50.54(q), 10 CFR 72.4 and 10 CFR 72.44(f), enclosed is a report of changes to the Humboldt Bay Site Emergency Plan (Revision 4), which became effective December 15, 2010. These changes did not decrease the effectiveness of the Plan, and the Plan continues to meet the requirements of 10 CFR 50.47(b), 10 CFR 50 Appendix E, and 10 CFR 72.44(a). The updated Humboldt Bay Site Emergency Plan has been distributed to NRC Region IV and is not included as part of this submittal.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul J. Roller'. The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul J. Roller

cc: Elmo E. Collins, Jr., NRC Region IV
Robert J. Evans, NRC
John B. Hickman, NRC
Christopher M. Staab, NRC
PG FossilGen HBPP Humboldt Distribution

Enclosure

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**REPORT OF CHANGES TO THE HUMBOLDT BAY SITE EMERGENCY PLAN (REVISION 4)
PURSUANT TO 10 CFR 50.54(q) and 10 CFR 72.44(f)
December 15, 2010**

Pursuant to the requirements of 10 CFR 50.54(q) and 10 CFR 72.44(f), the following changes to the Humboldt Bay (HB) Site Emergency Plan (EP) are submitted:

<u>SECTION</u>	<u>DESCRIPTION</u>
Table of Contents	Updated to reflect Revision 4 changes.
1.0	Revised to clarify the applicability of the EP to the current status of the HB site.
2.1	Updated the description to reflect the current status of the HB site, including that of the recently operational Humboldt Bay Generating Station (HBGS); added a statement that the United States Coast Guard will be contacted to maintain control of the water areas in the event that spent fuel cask handling activities are undertaken.
2.3	Revised to clarify the objective of transuranic contamination controls during decontamination and decommissioning (D & D) activities.
3.0	Corrected a typographical error: "activates" was changed to "activities;" deleted "analyzed" when describing those events which may potentially result from certain D&D activities: it was redundant and unnecessary for an understanding of why controls are imposed during such activities; enhanced/clarified the wording associated with restricting the off site doses that could result from certain D&D activities.
3.1.2	Deleted the word "pre-arranged" as it was overly restrictive in describing the recovery actions that may be necessary as a result of a site emergency.
3.1.3	Inserted the "ISFSI Shift Manager" as also having responsibility for determining whether or not an event is an emergency (in addition to the Emergency Coordinator).

<u>SECTION</u>	<u>DESCRIPTION</u>
3.2	Inserted the word "primarily" when describing the radioactive material present at HBPP 3; the listed contributors are not all inclusive, but are the most significant.
3.2.1	"Will be" was changed to "are" when describing the emergency equipment that is available at the HB site.
3.2.1.3	Revised to eliminate redundancy when describing site hazards that may result in EP activation; made an editorial enhancement to the discussion of natural occurrences that would be readily visible; deleted "and" for editorial enhancement.
3.2.1.4	Deleted the last sentence under "Description," as the information was a duplicate of information located at the beginning of this section.
4.2.1	Deleted reference to the "general public" having a role in emergency recovery actions.
4.4.1	Updated the title of the PG&E corporate emergency response organization.
5.1.1.1	Updated to reflect that it is the Primary Alarm Station (PAS) Operator, rather than the Control Operator, who is notified of an emergency condition and that it is that PAS Operator, rather than the Control Operator, who then notifies the Emergency Coordinator.
5.1.4	Updated the title of the PG&E corporate emergency response organization.
5.3.1.2	Restructured the discussion of site accountability to clarify the role of the site siren.
5.3.1.3	Deleted reference to the sounding of the site evacuation signal. This signal is no longer used.
5.3.3.1	Clarified the use of the siren system for personnel accountability and assembly.

<u>SECTION</u>	<u>DESCRIPTION</u>
5.3.3.2	Updated to reflect that it is the Primary Alarm Station (PAS) Operator, rather than the Control Operator, who is notified of a fire and that it is that PAS Operator, rather than the Control Operator, who then notifies the Emergency Coordinator.
6.1	Replaced the "control room" with the "security building" in the listing of the HBPP emergency response facilities.
6.2.1.3	Deleted discussion of the normal code call system because the system no longer exists; added a discussion of the use of the site VHF Radio system during an emergency.
6.2.1.4	Deleted section because the emergency code call system no longer exists.
6.2.1.5	Deleted the section and placed an updated version of the site VHF Radio System in Section 6.2.1.3.
6.2.2.1	Added a brief description of the audio characteristics of the site emergency siren.
6.2.2.2	Corrected a typographical error by removing the word "this."
6.3.1	Incorporated the plant "ventilation exhaust stack" as a potential release point that is continuously monitored.
Table 6.3.1	Made an editorial improvement by replacing "looks at" with "monitors" when describing the liquid radwaste effluent monitor.
6.3.2	Added "activity analysis" after "alpha" to be consistent with the remainder of the sentence.
6.5.1.1	Updated the discussion of the decontamination facilities to reflect current configuration and capability.

<u>SECTION</u>	<u>DESCRIPTION</u>
7.1	Spilt the responsibility for restoring access to previously evacuated areas: the emergency coordinator if the emergency is ongoing; otherwise, the Nuclear Plant Manager.
7.2	Clarified that 10 CFR 72.75 event reporting is applicable to the Independent Spent Fuel Storage Installation (ISFSI).
8.1.1	Spelled out PSRC: "Plant Staff Review Committee," and corrected five spelling/typographical errors.
8.1.2.a	Inserted "applicable" when referring to 10 CFR standards for making EP changes that do not require prior NRC approval.
8.1.2.b	Replaced "does not" with "will not" when referring to PG&E's compliance with regulations associated with making changes to the EP; corrected erroneous 10 CFR reference by replacing "50.45(q)" with "50.54(q);" enhanced the wording associated with obtaining NRC approval for proposed changes to the EP.
8.1.2.d	Replaced "applicable" with "appropriate" for consistency with section 8.1.2.a.
8.2.1	Corrected the category of procedures that is used to implement the EP: "Emergency Procedures" replaced with "Emergency Plan Implementing Procedures."
8.2.2	Added "City Ambulance" to the off site agencies that are provided with periodic training and with whom PG&E maintains routine contact to affirm that their supporting relationship remains in place.
8.3	Revised to specify that personnel performance is monitored during drills in addition to emergency equipment.

<u>SECTION</u>	<u>DESCRIPTION</u>
8.4	Updated EP terminology by changing reference to required audits of the "emergency preparedness program" to audits of the "emergency plan and implementing procedures" and reference to the "emergency preparedness organization" to the "emergency planning organization."
8.5	Inserted "supplies" in addition to "equipment" when discussing periodic inventory checks to ensure readiness.
Appendix A	Added "Unit 3" to the facilities for which recovery actions may be required following an emergency; deleted acronyms that do not appear in the body of the EP (EP & LTP); added acronyms that do appear in the body of the EP (ERO, MEPP, NUE, PBX & PFEC); corrected alphabetical ordering of listing.