Summary (Public Version)
U.S. Nuclear Regulatory Commission/General Electric-Hitachi Meeting
at the Vallecitos Nuclear Center

July 15, 2011

BACKGROUND

On July 15, 2011, staff from the U.S. Nuclear Regulatory Commission (NRC) met with staff from General-Electric Hitachi (GEH) at the Vallecitos Nuclear Center (VCN) in Sunol, California. The purpose of the meeting was to discuss the methods and basis of the methods used in the Decommission Funding Plan and Cost Estimate (DFP/CE) dated April 4, 2011, sent under a cover letter dated April 8, 2011 (Ref. 1). As part of the meeting, the NRC staff toured the Vallecitos site to gain an appreciation of the activities, and hence, the equipment and facilities that would eventually have to be decommissioned. Prior to the meeting, a list of discussion topics was sent to GEH.

After registering with the guards at the entrance, and viewing a safety film, the meeting began at about 8:30 AM (Pacific Time) and concluded at about 1:30 PM.

NRC PARTICIPANTS

Thomas Hiltz, Acting Deputy Director, Fuel Facility Licensing Directorate, Division of Fuel Cycle Safety and Safeguards, Office of Nuclear Material Safety and Safeguards

Robert K. Johnson, Chief, Fuel Manufacturing Branch, Fuel Facility Licensing Directorate, Division of Fuel Cycle Safety and Safeguards, Office of Nuclear Material Safety and Safeguards

Lydia Chang, Chief, Special Projects Branch, Decommissioning and Uranium Recovery Licensing Directorate, Division of Waste Management and Environmental Protection, Office of Federal and State Materials and Environmental Management Programs

Roman Przygodzki, Technical Reviewer, Special Projects Branch, Decommissioning and Uranium Recovery Licensing Directorate, Division of Waste Management and Environmental Protection, Office of Federal and State Materials and Environmental Management Programs[1]

Christopher Ryder, Licensing Project Manager, Fuel Manufacturing Branch, Fuel Facility Licensing Directorate, Division of Fuel Cycle Safety and Safeguards, Office of Nuclear Material Safety and Safeguards

GEH PARTICIPANTS

Mark Varno, Vice President, Advanced Programs, GEH

Scott Murray, Licensing and Liabilities Manager, GEH

Robert Lillge, Liability Reduction Manager, GEH

[1] Participated only in the meeting via teleconferencing

Louis Quintana, Acting Site Manager, VNC, GEH

Donald Krause, VNC Environmental Health and Safety Manager, GEH

Charles Vaughan, Consultant to GEH

DISCUSSION

R. Johnson began the meeting by stating the issues that the NRC staff had with the DFP/CE (Ref. 1); the issues had been sent to GEH and placed on the docket (Ref. 2). After a tour of the site, NRC and GEH staff discussed each of the four topics (scaling factor, site condition, level of detail, and high-level waste). No regulatory decisions were made by the NRC staff during the meeting. A formal NRC process will be used to obtain additional information. T. Hiltz added that during this meeting, the NRC staff wanted to learn more about the method used by GEH to develop the CE so that the licensing process could continue.

M. Varno stated that GEH has extensive decommissioning and licensing experience for the Vallecitos site. In addition to the activities under the Special Nuclear Material License SNM-960, GEH has five other NRC licenses and one California State materials license. Activities under Special Nuclear Material License SNM-960 take place primarily in four locations, laboratories in Building 103, hot cells in Building 102, the Hillside Storage Facility (HSF), and the Waste Evaporator Plant (WEP).

T. Hiltz asked where the majority of the decommissioning work under the SNM-960 license will occur. R. Lillge stated that the DFP/CE (Ref. 1) for the SNM-960 license accounts for Building 103, the HSF, the WEP, and all of the hot cells in Building 102; it is for activities under both the NRC and California State licenses. M. Varno affirmed this.

L. Chang asked about the storage pool in Building 102. C. Ryder stated that the storage pool is no longer used for special nuclear material, and hence, is not in the application to renew the SNM-960 License. The storage pool is discussed in the DFP/CE (Ref. 1). L. Chang inquired about contaminated sludge at the bottom of the pool. D. Krauss stated that the pool is currently being cleaned; there is no SNM in the pool. C. Vaughan stated that there is some discussion of the storage pool in the license application; additional photographs could be given to the NRC staff.

T. Hiltz stated that only some portions of Building 102 are under the DFP/CE (Ref. 1), which is more than is necessary. The responsibility of the NRC staff's review is for only those portions under the SNM-960 license. The NRC staff's determination of the adequacy of the DFP/CE (Ref. 1) is complicated by delineating those portions of Building 102 under the SNM-960 license. This circumstance is more complicated than it first appears. M. Varno stated that instead of differentiating between the SNM-960 licensed activities and activities under other licenses, GEH took a simpler approach by deciding to account for everything within the Building 102 perimeter. There is overlap among the NRC and State licenses. Nonetheless, GEH is confident that other regulators would agree with this approach. T. Hiltz asked if the State had reviewed the DFP/CE. S. Murray said that the State found the DFP/CE to be acceptable. State regulators had similar questions about the overlap of Federal and State licenses.

L. Chang said that an itemized method (e.g., Ref. 3) would be easier for the NRC staff to follow than the method that GEH chose.

Following the above discussion, GEH staff took the NRC staff on a tour of the site, emphasizing the areas that are discussed in the DFP/CE (Ref. 1):

- Building 103 laboratories
- Build 102 hot cells
- HSF
- WEP

Because of time constraints, the NRC staff peered into the HSF from outside the inner security gate. From the outside, GEH staff explained the visible components of the WEP. This was done to avoid having to don protective clothing. The NRC staff was taken by three nuclear reactors that are no longer operating.

After the tour, NRC and GEH staff returned to Building 103 where they continued their discussion. M. Varno resumed the discussion by acknowledging again the topics sent by the NRC staff. S. Murray continued by acknowledging comments on the DFP/CE made by the NRC staff in the November 2010 letter (Ref. 4). The DFP/CE was again discussed with the NRC staff during a public meeting (Ref. 5); GEH is confident that the issues raised by the NRC staff were addressed. M. Varno stated that GEH has a high degree of confidence in the DFP/CE (Ref. 1) method.

Discussion Topics:

- Basis and Description of the Scaling Factors
- Basis for Conditions of the Site Used in the CE
- Detail of Information for NRC Staff to Evaluate CEs
- Financial Assurance for Disposing of High-Level Waste at the HSF

CLOSING REMARKS

M. Varno stated that GEH will provide additional information to supplement the DFP/CE (Ref. 1). He is confident in the GEH method, which was developed by experienced GEH staff. The method is conservative.

The NRC found that the tour and discussion to be informative. T. Hiltz said that the NRC staff has some flexibility in making a determination during the acceptance phase. After a brief caucus, during which time the GEH staff left the room, T. Hiltz stated GEH will be informed of how the NRC will proceed.

ACTIONS

The NRC staff will notify the GEH staff of how they (NRC staff) will proceed.

REFERENCES

1. Letter From S. Murray, GE Hitachi, to NRC, “Revised License Renewal Application (“LRA”) and Decommissioning Funding Plan for Vallecitos Nuclear Center,” April 8, 2011. (Agencywide Documents Access and Management System (ADAMS) Accession Number ML111020332.

2. E-mail from R. Johnson, NRC, to S. Murray, GEH, “NRC Visit to GEH - Vallecitos Nuclear Center - July 15, 2011,” July 7, 2011. ADAMS Accession Number ML112030325.

3. USNRC, “Consolidated NMSS Decommissioning Guidance: Financial Assurance, Recordkeeping, and Timelines,” NUREG-1757, Volume 3, Appendix A, September 2003. ADAMS Accession Number ML032471471.

4. Letter from C. Ryder, NRC, to S. Murray, GE Hitachi, “Updated Decommissioning Closure Plan and Cost Estimate: GE-Hitachi Vallecitos Facility,” November 18, 2010. ADAMS Accession Number ML103080149.

5. Memorandum from C. Ryder, Project Manager, Fuel Manufacturing Branch, Fuel Facility Licensing Directorate, Division of Fuel Cycle Safety, and Safeguards, Office of Nuclear Material Safety and Safeguards, to P. Habighorst, Chief, Fuel Manufacturing Branch, "Summary of May 19, 2010, Pre-Licensing Meeting With GE-Hitachi Nuclear Energy: Vallecitos Nuclear Center," May 28, 2010. ADAMS Accession Number ML101410091.