



HITACHI

GE Hitachi Nuclear Energy

Donald R. Krause
Regulatory Compliance Program Manager,
Radiation Safety Officer
Vallecitos Nuclear Center

6705 Vallecitos Rd
Sunol, CA 94586
USA

T 925.862.4360
F 925.304-7435
Donald.Krause@ge.com

11 April 2013

Drew Persinko, Deputy Director
Decommissioning and Uranium
Recovery Licensing Directorate,
FSME/DWMEP/DURLD
Mail Stop 8 F5
Two White Flint North
11545 Rockville Pike,
Rockville, MD 20852

Attn: Document Control Desk

Ltr. No. DRK-2013-10

Subject: Request for Exemption from 10CFR50 Emergency Planning (EP) Requirements

Reference:

1. USNRC License No. DPR-1, Docket 50-018 (VBWR)
2. USNRC License No. TR-1, Docket 50-070 (GETR)
3. USNRC License No. DR-10, Docket 50-183 (EVESR)
4. 10 CFR 50.47
5. 10 CFR 50.54
6. 10 CFR 50 Appendix E
7. Regulatory Guide 2.6
8. ANSI/ANS Standard 15.16
9. NRC Letter from B. Watson to M. Varno concerning "Applicability of the Emergency Preparedness Final Rule to GE Vallecitos Decommissioning or Decommissioned Site", Dated March 19, 2013.
10. USNRC License No. R-33, Docket 50-73 (NTR)
11. USNRC License No. SNM 960, Docket 70-754

Dear Mr. Persinko:

GE Hitachi Nuclear Energy Americas, LLC, (GEH) has three shutdown reactors at the Vallecitos Nuclear Center (VNC) in Sunol, California under the provisions of licenses mentioned as references 1-3 above, issued by the U.S. Nuclear Regulatory Commission. These reactors are all in a de-fueled, SAFESTOR condition, with no active on-going operations. VNC maintains a common, site-wide emergency preparedness program that is routinely inspected in conjunction with the other NRC licenses; references 10 and 11.

GE Hitachi Nuclear Energy

AX45
FSME20

In order to comply with 10CFR50 sections referenced above as references 4-6 and reference 9, the NRC letter dated 19 March, GEH is requesting, within the prescribed 30 days from the date of the letter, for License No. DPR-1, Docket 50-018 (VBWR), License No. TR-1, Docket 50-070 (GETR), and License No. DR-10, Docket 50-183 (EVESR), exemptions from power reactor emergency preparedness requirements.

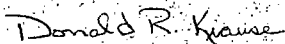
In order to maintain emergency preparedness for these licenses, VNC proposes continued use of the requirements for research reactors as detailed in Regulatory Guide 2.6 and ANSI/ANS Standard 15.16, which are the foundation for the current VNC emergency preparedness program.

The basis for this request is as follows. All reactors are in a de-fueled, SAFSTOR condition, with no active or on-going operations. No fuel assemblies from these reactors remain on-site. There are no personnel assigned specifically to these reactors. All systems are dry. Only residual contamination exists. Reactors under license DPR-1, Docket 50-018 (VBWR), and license DR-10, Docket 50-183 (EVESR) have undergone extensive source reduction work and only a few components remain within the containments. The facility under license TR-1, Docket 50-070 (GETR), is also defueled and dry. A source reduction program is not yet completed and component removal has not yet begun.

Contamination levels in all reactors are significantly reduced from when the reactors were shut-down and well below an operating research reactor. The highest recorded general area dose rates are around 60 mR/hr and the highest general area contamination levels are 95,000 dpm/ft². At these contamination/activity levels and without any vehicle to distribute material, continuing to use Regulatory Guide 2.6 and ANSI/ANS Standard 15.16 remains the most appropriate emergency preparedness process for VNC.

If you have any require any additional details or have any questions, please contact me at 925-862-4360.

Sincerely Yours,



Digitally signed by

Donald R. Krause

Date: 2013.04.11

11:52:37 -07'00'

Donald R. Krause

Regulatory Compliance Program Manager

c: M. Varno, GEH
J. Head, GEH
A. McFadden, GEH
E. Saito, GEH
S. Murray, GEH
M. Venters, GEH
J. Buckley, NRC