



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
1600 E. LAMAR BLVD  
ARLINGTON TX 76011-4511

March 3, 2016

Mr. Edward D. Halpin, Senior Vice President  
& Chief Nuclear Officer  
Pacific Gas and Electric Company  
P.O. Box 3  
Mail Code 104/6/601  
Avila Beach, CA 93424

SUBJECT: NRC INSPECTION REPORT 050-00133/16-001

Dear Mr. Halpin:

This letter refers to the inspection conducted on February 9-11, 2016, at your permanently shut down Humboldt Bay Power Plant, Unit 3 facility, near Eureka, California. The purpose of the inspection was to determine whether decommissioning activities were being conducted safely and in conformance with U.S. Nuclear Regulatory Commission (NRC) requirements. The results of the inspection were discussed with members of your staff at the conclusion of the onsite inspection on February 11, 2016.

During this inspection, NRC staff examined activities conducted under your license as they relate to public health and safety to confirm 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. The enclosed report presents the results of this inspection. No violations were identified, and no response to this letter is required.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," 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 from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the Public without redaction.

If you have any questions concerning this inspection, please contact Dr. Robert Evans, Senior Health Physicist, at 817-200-1234, or the undersigned at 817-200-1911.

Sincerely,

**/RA/**

Ray L. Kellar, P.E., Chief  
Fuel Cycle and Decommissioning Branch  
Division of Nuclear Materials Safety

Docket No: 050-00133

License No: DPR-7

Enclosure:

NRC Inspection Report 050-00133/16-001

cc: H. Hamzehee  
J. Post, Esq.  
L. Sharp  
Chairman, Humboldt County Board of Supervisors  
Law Office of Linda J. Brown, Esq.  
Regional Radiation Representative, U.S. Environmental Protection Agency  
J. Davis  
Director, Radiologic Health Branch  
G. Dumas, Esq.  
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Redwood Alliance  
R. Weisenmiller  
California Public Utilities Commission  
Deputy Attorney General  
R. Ferguson

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DATE	03/03/16	03/03/16		

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U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

Docket: 050-00133

License: DPR-7

Report: 050-00133/16-001

Licensee: Pacific Gas & Electric Company

Facility: Humboldt Bay Power Plant, Unit 3

Location: 1000 King Salmon Avenue  
Eureka, California 95503

Dates: February 9-11, 2016

Inspector: Robert Evans, Ph.D., C.H.P., P.E., Senior Health Physicist  
Fuel Cycle and Decommissioning Branch  
Division of Nuclear Materials Safety

Accompanied By: Ray L. Kellar, P. E., Chief  
Fuel Cycle and Decommissioning Branch  
Division of Nuclear Materials Safety

Approved By: Ray L. Kellar, P. E., Chief  
Fuel Cycle and Decommissioning Branch  
Division of Nuclear Materials Safety

Attachment: Supplemental Inspection Information

Enclosure

## EXECUTIVE SUMMARY

### Humboldt Bay Power Plant, Unit 3 NRC Inspection Report 050-00133/16-001

This U.S. Nuclear Regulatory Commission (NRC) 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.

#### Decommissioning Performance and Status Review

- The inspector observed various decommissioning activities in progress. The inspector concluded that the licensee was conducting decommissioning in accordance with the general guidance provided in the Post-Shutdown Decommissioning Activities Report. The work was being conducted in accordance with approved work plans and with an emphasis on industrial and radiological safety. The work plans provided sufficient detail for the work being performed. (Section 1.2.a)
- The licensee implemented the cross-contamination prevention and monitoring plan in accordance with license requirements. The licensee's staff conducted the quarterly surveys in accordance with procedure requirements, and the results of the surveys suggest that the licensee was preventing cross-contamination in the new power generation area. (Section 1.2.b)
- The licensee experienced a flooding event in December 2015 that impacted two previously completed radiological surveys. The inspector concluded that the licensee's actions taken in response to the flooding event were appropriate. (Section 1.2.c)

#### Occupational Exposures

- The licensee implemented its radiation protection program in accordance with 10 CFR Part 20, license, and procedural requirements. The licensee's occupational exposure records indicate that site workers received exposures below regulatory limits in 2015. The licensee downgraded its radiation protection program at the end of 2015 as allowed by regulations, and the licensee implemented area radiological sampling to ensure that occupational exposures remain below regulatory limits for worker monitoring. (Section 2.2)

#### Solid Radioactive Waste Management and Transportation of Radioactive Materials

- The licensee was characterizing, packaging, and shipping exemption wastes in accordance with procedural requirements and restrictions established in three alternate disposal requests previously approved by the NRC. (Section 3.2)

## Report Details

### **Site Status**

At the time of the inspection, the licensee continued to decommission the site in accordance with the general guidance provided in the Post-Shutdown Decommissioning Activities Report (PSDAR) dated July 19, 2013 (ADAMS Accession No. ML13213A160). The decommissioning work in progress included construction of the subsurface cutter soil mix (CSM) wall, movement of the excavated soil to the former discharge canal, and removal of potentially contaminated soil, concrete, piping, and wooden poles from the eastern yard.

During the inspection, the CSM wall was roughly half complete (137 of 255 panels). The licensee's contractor plans to complete the construction of the wall in the July-August 2016 time frame. The licensee plans to begin excavating the caisson structure in October 2016. Other projects planned for 2016 include final demolition of the refueling and liquid radwaste buildings and remediation of the intake canal. After completion of site decommissioning, the licensee plans to conduct final status surveys and site restoration work. The licensee currently plans to complete all field work by 2018.

### **1 Decommissioning Performance and Status Review (71801)**

#### **1.1 Inspection Scope**

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

#### **1.2 Observations and Findings**

##### **a. Construction of Subsurface CSM Wall**

The PSDAR provides general guidance about the licensee's plans to decommission the site. The inspector reviewed various work activities in progress and compared the work activities to the approved work orders and implementing procedures. The work in progress included construction of the CSM wall and transfer of the resultant spoils material to the discharge canal for future use as backfill material. The inspector concluded that the licensee was conducting work in accordance with work plan requirements, and the licensee was sampling the spoils material sufficiently to ensure that it met the criteria for eventual use as backfill material.

The licensee elected to construct a deep shoring and cutoff wall to allow for excavation and decommissioning of the reactor caisson and potentially contaminated subsurface soil. At the time of the inspection, the licensee's contractor had installed about half of the cutoff wall. The work was being conducted in accordance with instructions provided in Work Plan WP/EE-40, "Cutter Soil Mix Deep Shoring and Cutoff Wall Installation Work Plan and Engineering Evaluation," Revision 0. The inspector reviewed the work plan, interviewed contractor staff, and toured the work area.

The inspector compared the CSM wall construction work in progress with the instructions provided in Work Plan. The work plan provided sufficient detail for implementation of the work. The CSM wall was being constructed in five concentric

rings. The inner ring will be 106 feet deep and 110 feet in diameter. The next three rings will be constructed with increasing depths of 4 feet per ring. The outer ring, the groundwater cutoff ring, will be constructed at a depth necessary to anchor the wall into the subsurface clay material. This outer ring is expected to be constructed at a nominal depth of 174 feet below site grade. When complete, the five rings are expected to be 13-feet, 9-inches thick. After wall construction, the contractor plans to install four dewatering wells at a depth of 126 feet. The caisson removal work is expected to result in an excavated pit approximately 100 feet below grade. The combination of the CSM wall and dewatering pumps should ensure that the excavation work is conducted without encountering groundwater.

Each of the 255 CSM wall panels was approximately 1-meter wide by 3-meters thick. As noted earlier, the depth of each panel depended on which ring it was located. A mixing head with cutting wheels, installed on a mast, was used to install each panel. The construction of each panel was a two-step process. In the down-stroke phase, soil was fluidized and homogenized by pumping a bentonite slurry into the soil while the cutting wheels loosened the soil. After reaching the desired depth, in the second phase, the mixing tool was slowly extracted while the soil and cement slurry filled the excavation. The rotation of the wheels during the upstroke phase helped ensure that the soil and cement mixture was sufficiently homogenized.

After construction and curing of the CSM wall and dewatering of the cavity, the contractor is planning to begin the excavation work in October 2016. The inspector discussed with licensee and contractor staff the licensee's plans for industrial safety during excavation work. The contractor plans to install a barrier/curb system around the excavation pit for safety and security. A ventilation flow and exhaust system will have to be designed and installed for removal of excavator exhaust fumes. Administrative restrictions for access control will be implemented to control personnel access to this confined space. As discussed in Section 2.2 of this inspection report, the licensee will implement radiological protection controls as necessary based on the radioactivity levels of the structures and soil being removed from the pit. The inspector concluded that the licensee had pre-planned the industrial and radiological restrictions necessary to protect site workers.

The inspector observed the contractor's handling of the construction spoils material, a mixture consisting mainly of water and soil. The contractor used common construction equipment including backhoes, front-end loaders, and dump trucks to scoop the spoils out of the construction trenches, place the material into de-sanding units to separate the soil and water, and transfer the solidified spoils to the former discharge canal. In the discharge canal, lime was added to the spoils to solidify the material for placement in stockpiled lifts. At some point in the future, the spoils material will be used as backfill when the site is regraded.

The inspector reviewed the licensee's protocols for ensuring that the spoils material was not contaminated with radioactive and non-radioactive contaminants for use as backfill. The licensee and its contractor implemented several controls including collection of samples and bulk container sampling. Prior to conducting the CSM wall construction work, the licensee collected core samples from the areas where the wall would be constructed. Measurable quantities of licensed material, primarily cobalt-60 and cesium-137, were identified in certain samples. The average concentrations of all samples were below the soil cleanup derived concentration guideline levels in use by the licensee.



The contractor implemented a sampling program during CSM wall construction. The spoils material was sampled in accordance with guidance provided in the Waste Sampling and Analysis Plan, Revision 0, an attachment to Work Plan WP/EE-40. The number of samples collected and analyzed depended on the amount of spoils material removed during the CSM wall construction process. The work plan specified that eight samples would be collected from the first 3,000 cubic yards of material removed.

At the time of the inspection, the results of seven samples were available for review. The results indicated that the subsurface spoils contained low levels of naturally occurring radioactive material, but not licensed material. None of the sample results exceeded the radioactive material action levels for soil established in the draft License Termination Plan, Revision 1, submitted to the NRC by letter dated August 13, 2014 (ADAMS Accession Nos. ML14246A157, ML14246A158, and ML14246A159). The samples were also analyzed for metals, volatile compounds, and other chemical constituents.

In addition to spoils sampling, the licensee implemented a bulk sampling program. This sampling program consisted of surveying truckloads of spoils material using the onsite GUARDIAN detector system. A truck/trailer scan was conducted just prior to transfer of the spoils to the onsite discharge canal. This detection system included a combination of plastic scintillation and high-purity germanium detectors. Four detection panels monitored the spoils for a certain length of time (600-2,000 seconds). If the total amount of radioactivity is less than the administrative limit, the material is authorized for release and transported to the discharge canal. The inspector reviewed one representative GUARDIAN detector sample result and confirmed that the radioactive material met the criteria for use as backfill. The inspector also confirmed that the licensee had established lower limits of detection for the various truck/trailer types.

b. Cross Contamination Prevention and Monitoring Plan

License Condition 2.C.4 specifies that the licensee shall maintain a cross-contamination prevention and monitoring plan for the Humboldt Bay Generating Station. This license condition allowed the licensee to construct a new power generation plant on site property prior to completion of decommissioning of Unit 3. The licensee's implementation of the cross contamination prevention plan should help minimize the potential for re-contamination of previously surveyed and cleared areas.

The licensee implemented the cross-contamination prevention and monitoring plan in July 2009. Details of the plan are provided in Humboldt Bay Administrative Procedure C-220, "Cross Contamination Prevention and Monitoring Plan," dated July 2014. This procedure refers to two other procedures for implementing the cross-contamination prevention and monitoring plan. The first procedure, FSS-4, "Isolation and Control of Areas for Final Status Survey," dated October 2015, provides instructions for isolation and access control over areas that have been final surveyed. The second procedure, FSS-13, "Area Surveillance Following Final Status Survey," dated September 2013, provides instructions for conducting resurveys of areas previously final status surveyed.

During 2015, the licensee conducted quarterly radiological surveys of the Humboldt Bay Generating Station as required by site procedures. The inspector reviewed the results to determine if decommissioning activities in adjacent areas may have impacted the Humboldt Bay Generating Station survey unit. The average quarterly results for 2015

ranged from 4,605-4,797 counts per minute with an original background (baseline) mean value of 5,116 counts per minute. Although the 2015 sample results were within the acceptance criteria range (3,884-6,348 counts per minute), the inspector noted that the sample results were consistently lower than the original baseline survey results. The licensee's staff suggested that the radioactive source term has decreased since 2009, most likely due to demolition of the Unit 3 turbine building. The inspector noted that the licensee was not required to reset the baseline/background value unless the quarterly sample results exceed the lower acceptance criteria range (3,884 counts per minute).

The inspector reviewed the survey results for 2015 and noted that the results were consistent across the four quarters, suggesting that the licensee was preventing cross-contamination of the Humboldt Bay Generating Station in accordance with license and procedural requirements.

c. Flooding of Discharge Canal

During mid-December 2015, the licensee experienced a flooding event at the Humboldt Bay Power Plant site, resulting in flooding of the area around the discharge canal. The inspector reviewed the licensee's response to the flooding event and how it impacted previously completed radiological surveys.

In December 2015, Humboldt Bay experienced high winds, surf, and tides, resulting in the influx of seawater onto portions of the site. Seawater filled the discharge canal, an area that had been partially final status surveyed and confirmatory surveyed. The licensee processed as much of the standing water as possible using the existing groundwater treatment system. After the water had been removed from the discharge canal, the licensee elected to conduct additional radiological surveys to ensure that contamination had not spread into areas of the canal that had been previously surveyed.

The discharge canal was previously divided into three Class 1 survey units. (Survey unit classifications are defined in NUREG-1575, Revision 1, Multi-Agency Radiation Survey and Site Investigation Manual.) The first two survey units had been previously surveyed, and the third survey unit had not been surveyed. The licensee's staff conducted gamma scan surveys and soil sampling within limited portions of the first two survey units several days after the flooding event. The licensee did not identify any statistical difference between the original survey results and resurvey results.

However, the floodwater resulted in the comingling of soil between the second and third survey units. The licensee chose to combine a 333-square meter area from the second survey unit with the third survey unit. The licensee was considering a schedule for conducting the final status survey of the third survey unit at the conclusion of the onsite inspection. The NRC will review the survey results of the third survey unit at a later date, after completion of the survey.

1.3 Conclusions

The inspector observed various decommissioning activities in progress. The inspector concluded that the licensee was conducting decommissioning in accordance with the general guidance provided in the PSDAR. The work was being conducted in accordance with approved work plans and with an emphasis on industrial and

radiological safety. The work plans provided sufficient detail for the work being performed.

The licensee implemented the cross-contamination prevention and monitoring plan in accordance with license requirements. The licensee's staff conducted the quarterly surveys in accordance with procedure requirements, and the results of the surveys suggest that the licensee was preventing cross-contamination in the new power generation area.

The licensee experienced a flooding event in December 2015 that impacted two previously completed radiological surveys. The inspector concluded that the licensee's actions taken in response to the flooding event were appropriate.

## **2 Occupational Exposures (83100)**

### **2.1 Inspection Scope**

The inspector evaluated the licensee's program for monitoring and tracking occupational exposures to ensure that the program was being implemented in accordance with license and regulatory requirements. The inspector also reviewed recent changes to the occupational exposure monitoring program.

### **2.2 Observations and Findings**

The inspector reviewed the licensee's 2015 occupational exposure results for comparison to the regulatory limits specified in 10 CFR Part 20, Subpart C, Occupational Dose Limits. The licensee's records indicate that 337 workers were monitored in 2015. The highest individual total effective dose equivalent exposure was 0.494 rem with a regulatory limit of 5.0 rem. Nine individuals had assigned doses of greater than 0.1 rem. These individuals conducted work within or around the reactor pressure vessel and drywell, and similar areas with elevated exposure rates.

The licensee collected about 2,000 lapel air samples in 2015. About 800 of these samples were collected with workers performing work in respirators. Based on the sample results and the licensee's use of a 1-millirem threshold value, no worker was assigned an internal dose in 2015. Thus, all occupational exposures were based on external doses.

At the end of 2015, the licensee elected to downgrade the radiation protection program. The licensee made this decision, in part, based on actual field data, a reduction in the source term, and a technical analysis. The inspector reviewed the licensee's technical justification for reducing the radiation protection program including data used to support the decision.

In lieu of individual dose monitoring and radioactive restricted areas, the licensee implemented programs for monitoring ambient gamma radiation levels to ensure that worker doses remained below the regulatory thresholds established in 10 CFR 19.12, 19.13(b), 20.1301(a), and 20.1502. The licensee expects worker doses to remain below 100 millirem per year for the remainder of the project. These new monitoring programs include area monitoring using fixed location thermoluminescent dosimeters and routine radiological surveys using portable instrumentation.

During 2015, the licensee installed 33 ambient gamma radiation dosimeters, in addition to the original 24 dosimeters, at locations throughout the plant to monitor area dose rates. Detectable doses were measured at 4 of 33 locations. The licensee conservatively estimated that workers could have received no more than 7 millirem for 2015, if present at the most elevated location for one year. The licensee also placed dosimeters in certain equipment cabs during excavation work. These cab samples did not identify radiation levels above background levels.

The licensee's staff also conducted routine surveys of ambient gamma radiation levels using portable dose rate meters around the site. The inspector reviewed the most recent survey results. Only one area was identified as a radiation area, above 5 millirems per hour. This area consisted of several shipping containers of radioactive wastes. At the time of the inspection, only one shipping container remained onsite. The licensee planned to ship this container for offsite disposal immediately after the inspection.

In addition to area dosimeters and area surveys, the licensee used portable air samplers to measure airborne radioactivity. (The licensee had three portable air samplers in service during the onsite inspection.) The licensee's portable air sample results for 2015-2016 did not identify measurable quantities of airborne radioactivity. The licensee also collected 208 environmental air samples at four sampling stations in 2015. Only one sample showed a positive result for cobalt-60, but this sample result was below the occupational derived air concentration and effluent concentration limits specified in Appendix B to 10 CFR Part 20.

To support the downgrade in the radiation protection program and to demonstrate that workers will receive less than the regulatory dose limits (primarily the 100 millirem public dose limit), the licensee developed Technical Basis Document TBD-305, "Personnel Radiation Exposure Monitoring," Revision 0. This document provided the technical justification for downgrading the radiation work permit, dosimetry, and access control programs. The inspector reviewed and discussed this document with licensee staff. The inspector noted that the licensee plans to review the results of the downgraded radiation protection program at the end of 2016, in accordance with the requirements of 10 CFR 20.1101(c). The licensee will implement radiation protection program changes as necessary, based on this annual program review.

The last remaining known source term is the core belt region of the drywell. This area will be remediated as part of the caisson removal project. The licensee has not established an As Low As Reasonably Achievable (ALARA) goal for 2016. The licensee will conduct an ALARA assessment when additional radiological data for the reactor caisson removal work becomes available. Based on the data obtained at that time, the licensee may elect to reactivate portions of the radiation protection program, to ensure that doses remain ALARA.

During site tours, the inspector measured ambient gamma radiation exposure rates using a Ludlum Model 2401-EC2 survey meter (NRC No. 21116G, calibration due date of 03/13/16). Area postings were commensurate with radioactive materials storage and radiation levels present at the site.

### 2.3 Conclusions

The licensee implemented its radiation protection program in accordance with 10 CFR Part 20, license, and procedural requirements. The licensee's occupational exposure records indicate that site workers received exposures below regulatory limits in 2015. The licensee downgraded its radiation protection program at the end of 2015 as allowed by regulations, and the licensee implemented area radiological sampling to ensure that occupational exposures remain below regulatory limits for worker monitoring.

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

### 3.1 Inspection Scope

The inspector reviewed the licensee's waste management and radioactive material transportation programs to ensure compliance with license and regulatory requirements.

### 3.2 Observations and Findings

The inspector reviewed the licensee's management, shipment, and disposal of exemption wastes. The NRC granted the licensee three exemptions under the alternate disposal provisions of 10 CFR 20.2002, 10 CFR 30.11, and 10 CFR 70.17. The first exemption dated November 2, 2010 (ML102870344), allowed the licensee to dispose of 200,000 cubic feet of hazardous wastes containing low-activity radioactive debris at a Resource Conservation and Recovery Act (RCRA) facility in Idaho. The second exemption dated April 25, 2012 (ML120620454), allowed the licensee to dispose of 2 million cubic feet of hazardous waste, soil, and debris containing low-activity radioactivity. The third exemption dated December 19, 2012 (ML12244A098), allowed the licensee to dispose of approximately 100,000 cubic feet of hazardous waste, soil, and debris and 50,000 cubic feet of water containing low-activity radioactive material at the RCRA facility. Unlike the first two exemption approvals, the third approval allowed the licensee to dispose of material and liquids containing very low levels of special nuclear material at the RCRA facility.

The inspector reviewed how the licensee's staff controlled the shipment of wastes to the RCRA facility including a review of how the licensee ensured that the overall disposal limits were not exceeded. As part of the review and approval process for the three exemptions, the licensee proposed, and the NRC accepted, concentration limits for the various radionuclides for disposal at the RCRA facility. For example, maximum concentration for cesium-137 was established at 15 picocuries per gram (pCi/g), while the maximum concentration for cobalt-60 was established at 5 pCi/g. As part of the licensee's analysis, it established package exposure rate limits that corresponded to these concentration limits. The package dose rate limits were calculated to be 16.8 microRoentgens per hour ( $\mu\text{R/hr}$ ) at six inches and 7.27  $\mu\text{R/hr}$  at one meter.

The licensee implemented procedure instructions and software packages to manage the shipment of exemption wastes. Procedure RCP-6C, "Shipment of Solid Radioactive Waste," Revision 43, provided instructions for preparing, loading, and shipping the exempted wastes. Procedure RCP-6P, "Radioactive Material Shipments," Revision 14, provided instructions for ensuring compliance with packaging and shipping regulations. The inspector reviewed the documentation for three recently completed shipments, all

involving exempted wastes, for compliance with procedure requirements and the NRC's approved exemptions.

The first shipment consisted of material categorized as exemption 1 and 2 wastes. The second shipment included exemption 3 solid material, and the third shipment included exemption 3 liquid material. All three packages had sufficient documentation demonstrating that the material met the classification as exempt quantity material, based on the results of waste sampling and comparison of the average concentrations to the exemption limits approved by the NRC. For example, the shipment containing exemption 1 and 2 wastes was calculated to contain an average of 5.32 pCi/g of cesium-137 and 0.265 pCi/g of cobalt-60. Both of these concentrations were below the NRC-approved limits (15 pCi/g and 5 pCi/g, respectively).

As part of the shipment process, the licensee's staff also conducted dose rate surveys of the material, in part, to demonstrate compliance with the dose rate limits. For example, the exemption 3 solid wastes measured 7 µR/hr on contact with a 16.8 µR/hr limit.

The inspector observed representative containers of exempted wastes staged for shipment. The container labels were found to be in accordance with procedural requirements.

The licensee maintained records of all shipments for each exemption type, to ensure that the total amount of disposed material did not exceed the NRC-approved limits. At the time of the onsite inspection, the amount of exemption 1 and 2 wastes shipped to the RCRA facility since 2010 totaled 657,181 cubic feet, or approximately 30-percent of the NRC-approved limit. The amount of exemption 3 solid wastes shipped since 2012 totaled 4,512 cubic feet, or less than 5-percent of the limit. Finally, the amount of exemption 3 liquid wastes shipped since 2012 totaled 24,212 cubic feet, or approximately 48-percent of the limit.

### 3.3 Conclusions

The licensee was characterizing, packaging, and shipping exemption wastes in accordance with procedural requirements and restrictions established in three alternate disposal requests previously approved by the NRC.

## 4 **Exit Meeting**

The inspector presented the inspection results to the licensee's representatives at the conclusion of the onsite inspection on February 11, 2016. Representatives of the licensee acknowledged the findings as presented. During the inspection, the licensee did not identify any information reviewed by the inspector as proprietary.

## **SUPPLEMENTAL INSPECTION INFORMATION**

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K. Rod, Decommissioning Manager  
J. Salmon, Environmental Manager  
L. Sharp, Director and Plant Manager  
D. Sokolsky, Licensing  
M. Strehlow, Deputy Director

### **Inspection Procedures Used**

IP 71801 Decommissioning Performance and Status Review at Permanently Shutdown Reactors  
IP 83100 Occupational Exposure During SAFSTOR and DECON  
IP 86750 Solid Radioactive Waste Management and Transportation of Radioactive Materials

### **Items Opened, Closed, and Discussed**

#### **Opened**

None

#### **Closed**

None

#### **Discussed**

None

### List of Acronyms

ADAMS	Agencywide Documents Access and Management System
ALARA	As Low As Reasonably Achievable
CFR	Code of Federal Regulations
CSM	cutter soil mix
IP	Inspection Procedure
$\mu\text{R/hr}$	microRoentgens per hour
NRC	U.S. Nuclear Regulatory Commission
pCi/g	picocuries per gram
PSDAR	Post-Shutdown Decommissioning Activities Report
RCRA	Resource Conservation and Recovery Act