



January 17, 2017

DPG 17-011

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington DC 20555

Docket 72-11
Rancho Seco Independent Spent Fuel Storage Installation
License No. SNM-2510

**RANCHO SECO INDEPENDENT SPENT FUEL STORAGE INSTALLATION PROPOSED
LICENSE AMENDMENT NO. 4**

Attention: John McKirgan

In accordance with 10 CFR 72.56 "Application for Amendments of License," the Sacramento Municipal Utility District (SMUD) is submitting this proposed Amendment No.4 to the Rancho Seco Independent Spent Fuel Storage Installation (ISFSI) license. This amendment request seeks NRC approval to transfer the licensing for one radioactive byproduct source, currently possessed by SMUD under its 10 CFR 50 license (DPR-054, Docket 50-312), to the 10 CFR 72 license. SMUD proposes the following additional conditions for SNM license 2510.

License Condition 6. C	Byproduct Material (Sr90)
License Condition 7. C	Calibration Disc Sealed Source
License Condition 8. C	200 uCi
License Condition 9. C	Material identified in 6.C, 7.C, and 8.C to be used for calibration and standardization purposes.

All other conditions of the License and Technical Specifications to remain unchanged.

SMUD has committed to ANSI N323A, *Radiation Protection Instrumentation Test and Calibration – 1997*, in RSNAP-304, *RP Instrument Control Program* and in all instrument procedures. ANSI N323A Section 4.2.1.1 requires the performance of a source check near the endpoints of each scale (20% and 80% of full scale, which the instrument is expected to be used). ANSI N323A, Section 4.8 and RSNAP-304, Section 6.2 require a source check to be performed daily or prior to use, whichever is less frequent. Because these instruments are used to survey the ISFSI and for emergency response around the ISFSI where dose rates are 8.0 mr/hr now and could conceivably be higher during emergency response, SMUD requires a source capable of emitting this level of radiation. The Strontium-90 (Sr90) source being proposed for addition to the material governed by the licensor in the amendment request is the only one SMUD maintains with this capability.

Approval of this license amendment request will allow SMUD to maintain radiological detection equipment in accordance with our Radiation Control Program and our Emergency Plan after the termination the Rancho Seco 10 CFR 50 license. This proposed amendment is considered administrative in nature because the NRC has already authorized possession of the Sr90 source under the Rancho Seco 10 CFR 50 license (via the associated 10 CFR 40 license).

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This amendment simply transfers that authorization to the 10 CFR 72 license for the Rancho Seco ISFSI.

SMUD has evaluated the long term aspects of the continued maintenance of this source and determined that it will *not* have an adverse impact on public health and safety or the environment.

Pursuant to 10 CFR 51.41, SMUD has reviewed the environmental impact of the proposed amendment. The Sr90 source is the same radioactive isotope and quantity currently authorized under the Rancho Seco Part 50 license. Therefore, the proposed changes do not significantly change the type or significantly increase in the amounts of any effluents that may be released offsite. In addition, there is no significant increase in individual or cumulative occupational radiation exposure.

The proposed changes do not involve construction of any kind. Therefore, there is no significant construction impact. The proposed changes do not involve an increase in the potential for consequences from radiological accidents. The total estimated offsite doses for normal and off-normal conditions remain below the 10 CFR 72.104 limit and the total estimated offsite doses for all accident conditions remain below the 10 CFR 72.106 limits. The estimated normal, off-normal, and accident doses due to ISFSI operation described in the Ranch Seco ISFSI FSAR remain applicable and acceptable. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(11). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment was required or prepared in connection with the proposed amendment.

SMUD, nearing the completion of Phase II decommissioning its 10 CFR 50 licensed facility anticipates submission of the Final Status Survey Report Summary and the License Amendment Request to terminate this license at the earliest time consistent with the approval of this Licensing Action request.

We have also sent a copy of this proposed license amendment to the Radiological Health Branch of the California State Department of Health Services. If you, or members of your staff, have questions requiring additional information or clarification, please contact me directly at (916) 732-4893.

Sincerely,



Dan A. Tallman
Manager, Rancho Seco Assets

Cc:

John McKirgan, NRC Headquarters
William Allen, NRC Headquarters
Zahira Cruz, NRC Headquarters
Jack Parrot, NRC Headquarters
Marc Dapas, NRC, Region IV
Radiological Health Branch of the California State Department of Health Services