



**HITACHI**

**GE Hitachi Nuclear Energy**

**Scott P. Murray**  
Manager, Facility Licensing

3901 Castle Hayne Road  
P.O. Box 780  
Wilmington, NC 28402  
USA

T (910) 819-5950  
scott.murray@ge.com

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March 28, 2018

Jack D. Parrott, Senior Project Manager  
Reactor Decommissioning Branch  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

ATTN: Document Control Desk

Subject: GEH Response Plan for NRC Request for Additional Information

- References:
- 1) NRC License DPR-1, Vallecitos Boiling Water Reactor (VBWR), Docket 50-18
  - 2) NRC License DR-10, ESADA Vallecitos Experimental Superheat Reactor (EVESR), Docket 50-183
  - 3) NRC License TR-1, General Electric Test Reactor (GETR), Docket 50-70
  - 4) NRC License R-33, Nuclear Test Reactor (NTR), Docket 50-73
  - 5) Letter, GEH Vallecitos Nuclear Center (VNC) Request for Alternate Decommissioning Schedules for DPR-1, DR-10 and TR-1 Licenses, Exemption Request, 7/15/16
  - 6) Letter, S.P. Murray (GEH) to Director NMSS, GEH VNC Request for Alternate Decommissioning Schedules, Additional Information, 7/31/17
  - 7) Letter, J.D. Parrott (NRC) to S.P. Murray (GEH) Request for Additional Information, 1/18/18
  - 8) Letter, S.P. Murray to J.D. Parrott (NRC), GEH VNC Request for Additional Time to Respond to NRC Request, 2/7/18

Dear Mr. Parrott:

As indicated in your letter dated January 18, 2018 (Reference 7), NRC has determined that additional information is necessary to complete its evaluation of the request (Reference 6) by GE Hitachi (GEH) for an exemption supporting alternate decommissioning schedules for licenses DPR-1, DR-10, and TR-1 at the Vallecitos Nuclear Center site (References 1, 2, 3). NRC requested that GEH provide this additional information within 30 days or provide a plan for when the information can be provided. As I discussed with you on January 30, 2018, GEH has evaluated several options and has subsequently developed a plan to respond to the RAI's and a portion of this work is already underway. GEH stated in Reference 8 that it would provide a response by March 28, 2018. This letter provides that response.

A summary of the information requested by the NRC and a schedule for GEH to respond follows:

- 1) Provide an evaluation of the status of existing groundwater wells required to be sampled by the current environmental monitoring program, where water samples have not been obtained for many years. Provide the results of an evaluation to verify the ground water flow direction(s) for the site and that these wells are within the hydrologic flow paths from the shutdown reactors, including any models developed along with the plan and schedule for any corrective actions identified. (Reference 7, page 6).
- 2) Provide the radiological surveillance procedures for surveying the facilities and an evaluation that the current radiological measurement program accurately detects and measures the radiological hazards at the different shutdown reactor facilities considering the amount of radioactive decay that has occurred since the respective reactors have been shutdown. (Reference 7, page 6).
- 3) Demonstrate compliance with 10 CFR 50.75(g) regarding recordkeeping for radiological surveys and decommissioning records for the shutdown reactors. Describe documentation of locations and amounts of residual radioactivity in decommissioning records. Identify requirements in procedures for capturing and maintaining records important to decommissioning and provide procedures for NRC review. (Reference 7, pages 5-6).
- 4) Provide the procedure and documentation supporting the operation of the water level indicator for the surveillance of water level monitoring in the VBWR reactor vessel. (Reference 7, page 6).

GEH will provide the above information in approximately two months.

- 5) Demonstrate how the site is in compliance with the applicable safety regulations in 10 CFR 20.1501(a), including how the site is meeting the requirements for radiological surveying and monitoring of the subsurface and groundwater around the shutdown reactors. Describe how GEH meets requirements contained in 10 CFR 20.1501(a) or provide an alternate plan to meet the requirements of 10 CFR 20.1501(a) and 50.75(g). (Reference 7, pages 5-6).
- 6) Demonstrate compliance with 10 CFR 20.1406(c) by providing an engineering structural analysis of the shutdown reactor facilities that includes an analysis of their ability to maintain integrity of the building for purposes of ensuring confinement of the residual radioactivity; providing the plan for routine maintenance and surveillance of the shutdown facilities related to structural integrity and any special surveillance requirements that would be necessary should a seismic event occur during the current

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licensing period or during the requested extension to the decommissioning period; and providing a plan and schedule for when access to the lower portions of the VBWR will be safe for GEH employees and NRC staff and inspectors to enter so that they can effectively carryout surveillance and inspections. (Reference 7, pages 4-5).

Because the above information requires specialized expertise, GEH will provide an interim status report for the hydrological and structural analyses in approximately six months and anticipates complete delivery of this information within approximately twelve months.

Please contact me if you have any questions or would like to discuss this matter further.

Sincerely,

  
Scott P. Murray, Manager  
Facility Licensing

Attachment: None

Cc: B. Watson, USNRC NMSS  
SPM 18-021