

Attachment 2

GEH RAI response summary

## Attachment 2

### NRC Request for Additional Information Related to Vallecitos Nuclear Center (VNC) Request for Alternate Decommissioning Schedules GEH Response Summary Dated 5/31/18

1. **NRC Comment:** 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.

#### GEH Response

An evaluation was completed and is included as Attachment 3 in this response. After reviewing past reports and documentation available at VNC, it is concluded that the fifteen (15) wells that are part of the current environmental monitoring program are within the downstream hydrological flow path from the shutdown GETR reactor. These wells are sampled on a set periodic schedule and there is no indication of missed samples when water is present. However, based on this review, it does appear that additional monitoring wells within the downstream hydrological flow path of the shutdown EVESR and VBWR reactors may be needed. GEH is currently working with a certified Hydrogeologist to review ground water flow throughout the site and if necessary, GEH will contract as needed to determine the number and location of additional monitoring wells. This process is expected to take approximately 9 months.

#### Attachment 3:

##### 1. Evaluation of Existing Groundwater Wells, Sampling and Groundwater Flow of the Vallecitos Nuclear Center - May 2018

2. **NRC Comment:** 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.

#### GEH Response

VNC Facilities Maintenance Procedure 6.1 describes the access controls for the shutdown reactors. VNC Facilities Maintenance Procedure 6.2 describes the inspection and radiation survey frequency requirements for the shutdown reactors. VNC Nuclear Safety Procedure 3400 and 3430 addresses the radiation survey routines for the shutdown reactors. These procedures are included as Attachment 4 in this response. Routine radiological surveys conducted include air sampling, area smears analyzed for alpha, beta and gamma radiation and gamma dose rate determinations. The results of

these surveys are reported in the NRC GEH Annual Shutdown Reactor Report and are appropriate for the remaining radiological hazards.

**Attachment 4:**

1. VNC Facilities Maintenance Procedure 6.1, Revision 8, "Access Control"
2. VNC Facilities Maintenance Procedure 6.2, Revision 7, "Patrols and Inspections"
3. VNC Nuclear Safety Procedure 3400, Revision 10, "GETR Work Routines"
4. VNC Nuclear Safety Procedure 3430, Revision 17, "Areas 300/400 and Hillside Storage Facility Work Routines"

3. **NRC Comment:** 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.

**GEH Response**

The results of periodic radiological surveys are reported in the NRC GEH Annual Shutdown Reactor Report. The report for year 2017 is dated March 29, 2018 (ML18088A736). A copy of this report is included with the decommissioning records.

VNC Safety Standard 5.9 describes the records and information important for the safe and effective decommissioning of the shutdown reactors. This procedure is included as Attachment 5 in this response.

**Attachment 5:**

1. Vallecitos Safety Standard 5.9, Revision 5, "Retention of Radiation Safety Documents"

4. **NRC Comment:** 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.

**GEH Response**

VNC Facilities Maintenance Procedure 6.2, Section IV.A.2.e describes the operation and documentation of the VBWR reactor vessel water level monitor. This procedure is included as item 2 in Attachment 4 in this response. Two completed EVESR/VBWR weekly patrol sheets showing the vessel water level check on March 16 and April 5, 2018 are provided as examples in Attachment 6 to this response.

**Attachment 6:**

1. Example completed weekly VBWR vessel water level check sheets dated March 16 and April 5, 2018.