



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
1600 EAST LAMAR BOULEVARD  
ARLINGTON, TEXAS 76011-4511

September 5, 2018

Mr. Dan Tallman, Manager  
Rancho Seco Assets  
Sacramento Municipal Utility District  
14440 Twin Cities Road, MS N493  
Herald, CA 95638

SUBJECT: RANCHO SECO INDEPENDENT SPENT FUEL STORAGE INSTALLATION  
(ISFSI) INSPECTION REPORT 05000312/2018001 AND 07200011/2018001

Dear Mr. Tallman:

This letter refers to the U.S. Nuclear Regulatory Commission (NRC) inspection conducted on June 18-20, 2018, at the Rancho Seco Independent Spent Fuel Storage Installation (ISFSI) located near Herald, California. The NRC inspector discussed the results of this inspection with you and other members of your staff during a preliminary exit meeting conducted on June 20, 2018. The inspector performed additional in-office review of information provided following the onsite inspection. The inspector conducted a final telephonic exit meeting on August 7, 2018, with you and other members of your staff. The inspection results are documented in the enclosure to this inspection report.

The NRC inspection was conducted to confirm compliance with the requirements specified in your site specific Materials License No. SNM-2510 and associated Technical Specifications, the Rancho Seco ISFSI Final Safety Analysis Report (FSAR), and the regulations in 10 CFR Part 20 and Part 72. The inspection reviewed the areas of radiation safety, quality assurance, corrective actions program, and safety evaluations. The inspector reviewed changes made to your ISFSI program since the last NRC ISFSI inspection. Your ISFSI operations were found to be in compliance with the applicable NRC regulations and requirements and your storage casks were found to be in good physical condition. No violations were identified and no response to this letter is required.

In accordance with 10 CFR 2.390 of the NRC's "Agency 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 Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC's Website 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.

Should you have any questions concerning this inspection, please contact the undersigned at 817-200-1151 or Mr. Eric J. Simpson at 817-200-1553.

Sincerely,

/RA/

Janine F. Katanic, PhD, CHP, Chief  
Fuel Cycle and Decommissioning Branch  
Division of Nuclear Materials Safety

Docket: 50-312, 72-11  
License: DPR-54, SNM-2510

Enclosure:  
Inspection Report 05000312/2018001;  
07200027/2018001

w/attachment:  
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U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

Dockets: 050-00312, 072-00011

Licenses: DPR-54, SNM-2510

Report Nos.: 05000312/2018001 and 07200011/2018001

Licensee: Sacramento Municipal Utility District (SMUD)

Facility: Rancho Seco Nuclear Generating Station and  
Independent Spent Fuel Storage Installation (ISFSI)

Location: 14440 Twin Cities Road  
Herald, CA 95638-9799

Inspection Dates: June 18-20, 2018

Inspector: Eric J. Simpson, CHP, Health Physicist  
Fuel Cycle and Decommissioning Branch

Approved By: Janine F. Katanic, PhD, CHP, Chief  
Fuel Cycle and Decommissioning Branch  
Division of Nuclear Materials Safety

Enclosure

## EXECUTIVE SUMMARY

### **Rancho Seco Facility and Independent Spent Fuel Storage Installation NRC Inspection Report 05000312/2018001 and 07200011/2018001**

The U.S. Nuclear Regulatory Commission (NRC) conducted a routine inspection of the licensee's programs and activities for safe handling and storage of spent fuel at the Rancho Seco Independent Spent Fuel Storage Installation (ISFSI) on June 18-20, 2018. The inspection included the review of records and documentation to evaluate compliance with the applicable NRC regulations and the provisions of the site specific license, SNM-2510. The Rancho Seco facility was currently maintaining both a Title 10 of the *Code of Federal Regulations* (CFR) Part 50 license (Docket #50-312) and a 10 CFR Part 72 license (Docket #72-11). The majority of the 10 CFR Part 50 site has been remediated, decommissioned, and released from the 10 CFR Part 50 license. The reactor-related Greater-than-Class C (GTCC) wastes were stored in the ISFSI under the 10 CFR Part 72 license. The Interim Onsite Storage Building was the only remaining area on the 10 CFR Part 50 license. It was remediated and had undergone final status survey activities since the last ISFSI inspection. Rancho Seco formally requested termination of its 10 CFR Part 50 license in a letter dated September 21, 2017 (Accession No. ML17313A481). At the time of the NRC inspection, the NRC Office of Nuclear Materials Safety and Safeguards was continuing to review the licensee's request.

Twenty-two dry shielded canisters (DSC) have been loaded and stored in Horizontal Storage Modules (HSM) in the Rancho Seco ISFSI. All spent nuclear fuel was moved to the ISFSI pad between April 2001 and August 2002. A GTCC waste canister was loaded and placed on the ISFSI pad in August 2004. The ISFSI and other areas of the decommissioned reactor site were maintained in good condition and dose rates around the ISFSI perimeter were being monitored. A review of the Radiological Environmental Monitoring Program annual reports and ISFSI monitoring records demonstrated that radiological exposures to offsite locations and individuals onsite were in compliance with federal regulations.

The NRC routine ISFSI inspection reviewed documentation relevant to the 10 CFR Part 72 activities and operations that have occurred at Rancho Seco since the last inspection in May 2016. The reviewed documentation included quality assurance audit reports, radiological surveys, ISFSI related condition reports, and the site Emergency Plan and supporting documentation. The inspector also reviewed documents demonstrating compliance with license technical specifications, compliance with the Rancho Seco ISFSI Final Safety Analysis Report (FSAR), and annual ISFSI maintenance activities.

#### Away-From-Reactor ISFSI Inspection Guidance (60858)

- The licensee was conducting quality assurance audits of all site programs, including those impacting the ISFSI program. A review of six audit reports determined that the Quality Assurance Program was covering a broad range of areas. Issues identified during the audits were entered into the Rancho Seco corrective action program for resolution. (Section 1.2.a)
- Selected condition reports were reviewed for the period May 2016 through June 2018. A wide range of conditions had been identified and resolved. Resolutions of the condition reports were appropriate for the safety significance of the identified issues. No adverse trends were identified during the review. (Section 1.2.a)

- Radiation levels around the ISFSI pad were consistent with the licensee's quarterly surveys and area monitoring results. Radiation data reviewed from the 2015, 2016, and 2017 Annual Radiological Environmental Operating Reports (AREORs) determined that radiation levels offsite were in compliance with 10 CFR 72.104. (Section 1.2.b)
- Since the last NRC ISFSI inspection, Rancho Seco had revised their ISFSI FSAR three times. The NRC was notified of the update to Revision 7 on June 11, 2018. (Section 1.2.c)
- ISFSI License SNM-2510 Appendix Technical Specification 5.5.3 requirements for daily HSM roof temperature monitoring/vent inspections were performed as required. No temperature issues with the casks were identified during the review of selected records. (Section 1.2.d)
- The licensee made editorial changes to the site's Emergency Plan (E-Plan) to bring it under a new procedure hierarchy to reflect the proposed termination of the 10 CFR Part 50 license. None of the changes reduced the effectiveness of the site's E-Plan. Therefore prior NRC approval was not required for the changes. The inspector verified that the annual drills and biennial exercises required by the E-Plan had been occurring onsite during the period since the last ISFSI inspection (May 2016 through June 2018). These drills and exercises were compliant with the E-Plan and 10 CFR 72.32(a)(12) requirements. (Section 1.2.e)

#### Review of 10 CFR 72.48 Evaluations (60857)

- All required safety screenings and safety evaluations had been performed in accordance with licensee procedures and requirements of 10 CFR 72.48. All screenings and safety evaluations reviewed were determined to be adequately evaluated. (Section 2)

## Report Details

### Summary of Facility Status

The Sacramento Municipal Utility District (SMUD) maintains an NRC site-specific 10 CFR Part 72 license, SNM-2510, for the Rancho Seco Independent Spent Fuel Storage Installation (ISFSI). The ISFSI site has 22 loaded storage casks. Twenty-one storage canisters contain 493 spent fuel assemblies on the ISFSI pad. That number includes 13 failed fuel assemblies loaded into a dedicated failed fuel canister and 6 suspected failed fuel assemblies loaded into 5 undamaged spent fuel canisters. The final storage canister contains reactor related Greater-than-Class C (GTCC) waste and is stored on the pad along with the spent fuel. The spent fuel and GTCC waste canisters are stored in AREVA TN Horizontal Storage Module (HSM) design casks. The Rancho Seco dry shielded canisters (DSCs) are based on the Standardized NUHOMS 24P - DSC design. The 21 canisters containing fuel were loaded using SNM-2510 License Amendment 0 and SAR Revision 1 or 2. The GTCC canister was loaded using SNM-2510 License Amendment 2 and FSAR Revision 3. The SNM-2510 License Amendment 3 was issued on August 11, 2009, to allow for the continued storage of 6 suspected failed fuel assemblies in 5 DSCs already in storage on the pad. The discovery of the potentially failed fuel was made after the fuel had been loaded into the ISFSI. The licensee was currently on SNM-2510 License Amendment 4 and Final Safety Analysis Report (FSAR), Revision 7 at the time of the inspection.

## **1 Away-From-Reactor ISFSI Inspection Guidance (60858)**

### **1.1 Inspection Scope**

An inspection of the status of the loaded casks at Rancho Seco was completed to verify compliance with requirements of their NRC license, SNM-2510, their ISFSI FSAR, and federal regulations. The inspection reviewed a broad range of topics including Quality Assurance audits and surveillances conducted by the licensee, condition reports related to the ISFSI, environmental radiological data collected around the ISFSI for the past several years, review of the cask maintenance records, and emergency preparedness activities for the site. An inspection of the ISFSI pad area was performed and radiological dose rates measured by the inspector around the perimeter of the ISFSI pad and near the casks.

### **1.2 Observations and Findings**

#### **a. Quality Assurance Audits, Surveillances, and Corrective Actions Program**

SMUD Audit and Quality Services (AQS) had been performing 10 CFR Part 72 Quality Assurance audits and surveillances as required by Procedure RSLBD-010, "Rancho Seco Quality Manual," Rev. 2. AQS had issued 6 non-security related ISFSI quality assurance audit reports since the May 2016 ISFSI inspection. These audits assessed the performance of quality related programs and activities that impacted ISFSI operations, including: Process Control; License and Technical Specification Compliance; Radiation Protection and As Low As Reasonably Achievable; and Materials Control and Accounting. All six Quality Assurance audit reports were reviewed as part of the current inspection. The audit reports resulted in several recommendations and four *potential deviations from quality* (PDQ) that were placed into the Rancho Seco corrective action program (CAP). As in the previous inspection, the majority of the ISFSI related

recommendations and potential deviations from quality were related to minor administrative lapses, procedures not reflecting current plant status, and organizational changes not being properly reflected in site documentation. All of the audit areas were assessed as being satisfactory with effective implementation.

When a deficiency was identified at Rancho Seco, the licensee would document the problem as a PDQ for placement into its CAP, as required by Procedures RSAP-1308, "Potential Deviation from Quality," Rev. 18 and RSAP-1310, "Deviation from Quality," Rev. 9. The licensee provided the inspector with a list of ISFSI related PDQs issued since the last NRC inspection. Out of the list of PDQs (including those identified during the NRC's review of Quality Assurance (QA) audits and surveillances), the inspector selected seven for further review. All of the ISFSI related PDQs were of minimal safety significance. The selected PDQs were well documented and properly categorized based on the low safety significance of the identified conditions and follow-up corrective actions were appropriately assigned. No safety concerns were identified during NRC's review of Rancho Seco's ISFSI QA audit reports, surveillances, and condition reports.

b. Radiological Conditions Related to Stored Casks

The NRC inspector verified the radiological conditions of the Rancho Seco ISFSI through review of radiation monitoring data provided by optically stimulated luminescent dosimeter (OSLD) records, recent licensee survey results, and independent radiation measurements of the ISFSI pad. The NRC inspector was accompanied by the Rancho Seco Assistant Superintendent, the SMUD Emergency Preparedness Program Manager, and a member of the licensee's security staff during the inspection of the ISFSI pad. The ISFSI pad was securely fenced and locked inside its own protected area (PA) with a posted security officer. The ISFSI pad was surrounded on all sides by a concrete approach apron, several feet of gravel, and two fences. The ISFSI area was absent of any vegetative growth and there were no flammable, combustible, or unexpected items present on or near to the ISFSI storage pad. The ISFSI pad contained 22 AREVA TN NUHOMS HSM casks. Twenty-one contained spent nuclear fuel and one contained reactor related GTCC waste from the Rancho Seco reactor. The ISFSI pad and storage casks were in good physical condition with very little noticeable weathering. The NRC inspector performed independent radiation measurements with a Ludlum Model-19 sodium-iodide gamma survey meter (NRC #033906, calibration due July 21, 2018) which measured gamma exposure rates in microRoentgens per hour ( $\mu\text{R/h}$ ).<sup>1</sup> The inspector measured the radiation level at ISFSI fence entry location of 22  $\mu\text{R/h}$ . The ISFSI radiation controlled area boundary measured from 50–180  $\mu\text{R/h}$ . The background exposure rate was found to be ~9  $\mu\text{R/h}$  at offsite locations. The radiological conditions in and around the ISFSI were consistent with recent licensee survey reports and were somewhat lower than what was measured during the previous routine NRC inspection (Accession No. ML16173A117). The ambient radiation levels are expected to decrease over time. The ISFSI was properly posted as both a radiation area and a radioactive materials area.

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<sup>1</sup> For the purposes of making comparisons between NRC regulations based on dose-equivalent (rem) and measurements made in Roentgens, it may be assumed that one Roentgen equals one rem. (<http://www.nrc.gov/about-nrc/radiation/protects-you/hppos/qa96.html>)

ISFSI radiation monitoring data was reviewed by the inspector. Rancho Seco monitored direct radiation impacts onsite and offsite using OSLDs. Data were reviewed for the previous two years and the first quarter of 2018. The OSLD monitoring results documented overall declining ambient radiation levels near the ISFSI boundary (see Table 1, below).

**Table 1, Yearly ISFSI Direct OSL Monitoring Results (mrem)<sup>2</sup>**

Sample ID	Location	2014	2015	2016	2017
ISFSI-1	North Fence	256	241	221	218
ISFSI-2	North Fence	353	312	323	289
ISFSI-3	West Fence	107	93	84	81
ISFSI-4	West Fence	115	93	94	91
ISFSI-5	South Fence	220	200	191	185
ISFSI-6	South Fence	350	337	340	302
ISFSI-7	East Fence	83	79	71	72
ISFSI-8	East Fence	83	72	75	67

The NRC inspector also reviewed direct radiation monitoring data from the Rancho Seco Annual Radiological Environmental Operating Reports (AREORs) for 2015, 2016, and 2017. The AREORs are published annually to document the radiological impacts to onsite and offsite locations as a result of licensed activities. The AREORs were compiled and published by the Radiological Environmental Monitoring Program (REMP). Along with other types of environmental monitoring, these reports documented indicator OSLD results for site boundary locations in close proximity to the ISFSI. These results were selected to document possible annual direct radiation deep dose equivalent rates to any individual located at the site controlled area boundary near the ISFSI (see Table 2, below).

**Table 2, REMP Monitoring Locations near ISFSI (in mrem)<sup>3</sup>**

Sample ID	Location	2016	2017
88	South ISFSI 100 m fence	13.5	11
89	Southwest Corner ISFSI 100 m fence	9.5	8
90	Northwest Corner ISFSI 100 m fence	18.5	19
94	North ISFSI 100 m fence	18.5	18
99	ISFSI 100 m fence vehicle access gate	17.5	17

REMP data documented the deep dose equivalent to any real individual located at the site controlled area boundary was well below the 10 CFR 72.104(a)(2) requirements. Onsite and offsite radiological impacts from the Rancho Seco ISFSI met all regulatory requirements.

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<sup>2</sup> Monitoring data was normalized to represent doses over an 8760 hour year.

<sup>3</sup> All values corrected for background.

c. Changes to the SNM-2510 License and ISFSI FSAR

At the time of the current inspection, Rancho Seco was utilizing ISFSI License SNM-2510 Amendment 4 and FSAR Revision 7. During the previous inspection at the site, the licensee was on ISFSI license Amendment 3 and FSAR Revision 4. The move to license Amendment 4 from 3 was made to transfer the licensing for a radioactive byproduct source from its 10 CFR Part 50 license to its 10 CFR Part 72 license. The 200 microcurie strontium-90 source is now listed on ISFSI license SNM-2510. The site uses the strontium-90 as a check source for its radiation detection instruments, used for survey purposes and emergency response. License Amendment 4 was approved by the NRC on November 24, 2017 (Accession No.: ML17290A008).

Three revisions to the site FSAR were made since the last NRC inspection. The move from FSAR Revision 4 to 5 was made in order to recognize procedure changes and the addition of an ISFSI equipment storage unit within the 10 CFR Part 72 boundary. The move from FSAR Revision 5 to 6 was made to incorporate error corrections in the *Footers, Table of Contents, and List of Effective Pages*, along with other editorial corrections that were identified while preparing a consolidated ISFSI SAR for submittal to the NRC in support of the AREVA/WCS ISFSI Application. The move to FSAR Revision 7 was made to reflect the licensee's move from SNM-2510 License Amendment 3 to Amendment 4. All of the FSAR revisions passed the 10 CFR 72.48 screening process and therefore none of the changes required NRC approval.

d. Daily Vent Inspections and Thermal Monitoring per Technical Specification 5.5.3

The Rancho Seco License SNM-2510 Technical Specification 5.5.3 required daily visual inspection of the air inlet vents for the HSMs and required daily temperature monitoring of the HSM's roof temperatures. For temperature monitoring, if any temperature monitor rose by more than 80 degrees Fahrenheit (F) in a 24 hour period or if any temperature reading exceeded 225 degrees F, then it was possible that an inlet or outlet vent had become blocked and would require corrective action. To perform these actions the licensee utilized Procedure RSIP-710, "ISFSI & Instrument Checks & System Verification Daily Surveillance," Revision 0 for reviewing and recording the concrete temperatures. Additionally, the procedure required visual inspection of the inlet vents on a daily basis. Documentation of both required surveillances was reviewed for a selected sample of weeks during the months of May 2016, September 2017, and February 2018. Licensee records indicated that the technical specifications had been routinely performed and correctly documented as required by procedure and the License Technical Specifications. The NRC inspector did not note any adverse conditions during the review of the surveillance records.

e. Emergency Plan

Changes to the licensee's emergency planning program since the last NRC inspection in May 2016 were reviewed. At the time of the current inspection, Rancho Seco was utilizing Rancho Seco Procedure RSLBD-020, "Emergency Plan," Rev. 0. The Emergency Plan (E-Plan) was essentially moved to a new procedure hierarchy from the previously used E-Plan (Change 6), Rev. 1. In addition to the move to a different procedure hierarchy, other changes included administrative changes to organization position titles; the implementation of a new security computer system at the site; the separation of SMUD Security from the responsibility of implementing the Rancho

Seco E-Plan; and updates to reflect current site conditions. The licensee performed a 10 CFR 50.54(q)/10 CFR 72.44(f) evaluation and determined that the changes made in RSLBD-020, Rev. 0, did not reduce the effectiveness of the plan. Therefore, the changes were made without prior NRC approval. The NRC inspector reviewed the evaluations performed and in consultation with NRC regional management supported Rancho Seco's conclusion that prior NRC approval was not needed to support the changes to the E-Plan.

The E-Plan drill and exercise packages from 2016 through 2018 were selected for review. Rancho Seco was driven by the E-Plan, Section 7.3, Drills and Exercises, to conduct annual drills to exercise site fire and medical preparedness and a biennial exercise that includes response activities by the entire site. The inspector verified that the annual drills had been performed in 2016 and 2017 in compliance with the E-Plan and 10 CFR 72.32(a)(12) requirements. The drill packages selected for review included a medical and fire exercise and training session conducted on December 10, 2016, and a medical and fire exercise that was conducted on December 12, 2017. Typical exercise packages included a description of the drill that was conducted, a timeline, and an evaluation of exercise objectives. Herald Fire Department participated in both exercises. Emergency Preparedness exercises and drills were being performed satisfactorily and accordance with site procedures.

### 1.3 Conclusions

The licensee was conducting quality assurance audits of all site programs, including those impacting the ISFSI program. A review of six audit reports determined that the Quality Assurance Program was covering a broad range of areas. Issues identified during the audits were entered into the Rancho Seco corrective action program for resolution.

Selected condition reports were reviewed for the period of May 2016 through June 2018. A wide range of conditions had been identified and resolved. Resolutions of the condition reports were appropriate for the safety significance of the identified issues. No adverse trends were identified during the review.

Radiation levels around the ISFSI pad were consistent with the licensee's quarterly surveys and area monitoring results. Radiation data reviewed from the 2015, 2016, and 2017 AREORs determined that radiation levels offsite were in compliance with 10 CFR 72.104.

Since the last NRC ISFSI inspection, Rancho Seco had revised their ISFSI FSAR three times. The NRC was notified of the update to Revision 7 on June 11, 2018.

The ISFSI License SNM-2510 Appendix Technical Specification 5.5.3 requirements for daily HSM roof temperature monitoring/vent inspections were performed as required. No temperature issues with the casks were identified during the review of selected records.

The licensee made editorial changes to the site's E-Plan to bring it under a new procedure hierarchy to reflect the proposed termination of the 10 CFR Part 50 license. None of the changes reduced the effectiveness of the site's E-Plan. Therefore prior NRC approval was not required for the changes. The inspector verified that the annual

drills and biennial exercises required by the E-Plan had been occurring onsite during the period since the last ISFSI inspection (May 2016 through June 2018). These drills and exercises were compliant with the E-Plan and 10 CFR 72.32(a)(12) requirements.

## **2 Review of 10 CFR 72.48 Evaluations (60857)**

### **2.1 Inspection Scope**

The licensee's 10 CFR 72.48 screenings and evaluations since the May 2016 NRC routine inspection of the Rancho Seco ISFSI were reviewed to determine compliance with regulatory requirements.

### **2.2 Observations and Findings**

The licensee utilized Procedure RSNAP-091, "Safety Review of Proposed Changes, Tests, and Experiments," Rev. 0 to perform the 10 CFR 72.48 safety screenings and evaluations. A list of modifications to the Part 72 program was provided by the licensee. The NRC inspector reviewed eleven 10 CFR 72.48 screenings which resulted in ten 10 CFR 72.48 evaluations. The inspector reviewed all ten evaluations. The changes being made and evaluated at the Rancho SECO ISFSI included changes to the Physical Security Plan, changes to the ISFSI FSAR, and numerous procedure changes. The safety evaluations documented that none of the proposed changes required prior NRC approval.

### **2.3 Conclusions**

All required safety screenings and safety evaluations had been performed in accordance with licensee procedures and requirements of 10 CFR 72.48. All screenings and safety evaluations reviewed were determined to be adequately evaluated.

## **3 Exit Meeting**

The inspector reviewed the scope and findings of the inspection during a final telephonic exit meeting conducted on August 7, 2018.

**SUPPLEMENTAL INSPECTION INFORMATION  
PARTIAL LIST OF PERSONS CONTACTED**

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B. Gacke, Assistant Superintendent, Rancho Seco Assets  
C. Formhals, Security Project Manager  
J. Briggs, Emergency Preparedness Program Manager, SMUD  
R. Duggan, Office Technician, SMUD

**INSPECTION PROCEDURES USED**

IP 60858      Away-From-Reactor ISFSI Inspection Guidance  
IP 60857      Review of 10 CFR 72.48 Evaluations

**LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED**

Opened

None

Discussed

None

Closed

None

**LIST OF ACRONYMS**

ADAMS	Agencywide Documents Access and Management System
AQS	Audit and Quality Services
AREOR	Annual Radiological Environmental Operating Report
CAP	Corrective Action Program
CFR	Code of Federal Regulations
DNMS	Division of Nuclear Material Safety
DSC	Dry Shielded Canister
E-Plan	Emergency Plan
FSAR	Final Safety Analysis Report
GTCC	Greater Than Class C
HSM	Horizontal Storage Module
ISFSI	Independent Spent Fuel Storage Installation
OSLD	Optically Stimulated Luminescent Dosimeter
µR/h	microRoentgen per hour
mrem	milliRoentgen equivalent man
NRC	U.S. Nuclear Regulatory Commission
NUHOMS	NUTECH Horizontal Modular Storage
PA	Protected Area
PDQ	Potential Deviation from Quality
QA	Quality Assurance
REMP	Radiological Environmental Monitoring Program
SMUD	Sacramento Municipal Utility District

RANCHO SECO FACILITY AND INDEPENDENT SPENT FUEL STORAGE INSTALLATION  
 (ISFSI) INSPECTION REPORT 05000312/2018001 AND 07200011/2018001 – DATED  
 SEPTEMBER 5, 2018

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