

Docket No. 50-133

Mr. P. A. Crane
Vice President and General Counsel
Pacific Gas and Electric Company
77 Beale Street, 31st Floor
San Francisco, California 94106

Dear Mr. Crane:

This letter transmits a Request for Information under 10 CFR 50.54(f) which requires response within 30 days of the date of the Request. You are requested to state whether or not you plan to bring the Humboldt Bay facility into compliance with current operational requirements. Depending upon the nature of your response, you are also requested to provide supporting information as described in the Request.

Sincerely,

Thomas A. Ippolito, Chief
Operating Reactors Branch #2
Division of Licensing

Enclosure:
Request for Information

cc w/encl:
See next page

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DATE	4/28/81	4/28/81	4/28/81	4/30/81	4/29/81

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of

PACIFIC GAS AND ELECTRIC COMPANY

Docket No. 50-133

(Humboldt Bay Power Plant,
Unit No. 3)

REQUEST FOR INFORMATION

I.

The Pacific Gas and Electric Company (the licensee) holds Facility Operating License No. DPR-7 (the license) which, when issued, authorized the licensee to operate the Humboldt Bay Power Plant, Unit No. 3 at power levels not in excess of 220 megawatts thermal. The license was originally issued on January 21, 1969 and is currently due to expire on November 9, 2000. The facility consists of a boiling water reactor located in Humboldt County, California.

II.

Appendix A (Technical Specifications) of Facility Operating License No. DPR-7 requires that the nuclear steam supply system components, including the reactor vessel and its internals, shall be designed to withstand and be able to operate under a seismic loading of 0.25g. This seismic design criterion, based on a static loading method of analysis, was found acceptable by the former Atomic Energy Commission (predecessor to NRC) on August 28, 1962 and a provisional operating license was issued to the licensee. In connection with the Advisory Committee on Reactor Safeguards' and AEC staff's review of the licensee's application for a Full-Term Operating License, however, the licensee agreed to perform an updated seismic review to define the proper seismic accelerations and spectra applicable to the plant site and, if necessary, to perform a dynamic analysis of safety related components.

Following issuance of Full-Term Operating License No. DPR-7 on January 21, 1969, the licensee submitted updated geologic and seismic studies in May 1971. During the course of the review of the licensee's report by the AEC staff and a subsequent site visit, several areas were identified which required further study. Consequently, the staff required that the licensee provide an update of the seismic design analysis of safety related structures, systems, and components for this facility and provide additional data for geological and seismological determinations of the magnitude and location for the Safe Shutdown Earthquake (SSE), and data for determining the geological significance of the Little Salmon fault and the Bay Entrance fault.

Based on review of the above information, the NRC staff concluded that outstanding concerns still existed regarding the Humboldt Bay seismic reevaluation and, on May 21, 1976, issued an Order for Modification of License (Order) confirming the licensee's commitments to address these concerns prior to restart from the 1976 refueling outage.

It should be noted that during the course of the seismic reevaluation which extended from the licensee's May 1971 submittal referred to above until the issuance of the Order, the regional geologic picture was developed in greater detail. As that regional picture became clearer with the acquisition of new data, the confidence that the original plant design could withstand all postulated seismic events declined. It was for this reason that the staff required, in the Order, that the geologic/seismic investigations and the seismic design upgrading be completed prior to restart from the 1976 refueling outage.

III.

From approximately June 1976 until the present, the licensee and its consultants have conducted extensive geologic investigations and plant seismic modifications. During the course of this work the staff has held meetings with the licensee and has made several site visits.

By letter dated March 25, 1977, the licensee submitted the draft report "Humboldt Bay Power Plant Site, Geologic Investigations," in partial fulfillment of the requirements specified in the Order. On May 20, 1977, the licensee filed an application for a license amendment which would permit restart of operation based on satisfactory completion of the Order's requirements. A request for hearing with respect to this amendment was submitted by representatives of individuals from the Humboldt Bay area and granted by an NRC Atomic Safety and Licensing Board (Licensing Board).

Based on its review of the draft report, the NRC staff informed the licensee on August 5, 1977, that it could not conclude with reasonable certainty that surface faulting would not occur at the Humboldt Bay site. The NRC staff also stated its intent to recommend denial of the licensee's amendment application for restart to the Licensing Board established to rule on this matter.

The licensee then discussed with the NRC staff a program for further investigations and began a series of geologic and seismic studies designed to resolve the concerns expressed by the NRC staff. While these studies were in progress, the licensee sought and received several continuances in this proceeding to allow completion of these studies.

On December 31, 1980, the licensee filed a motion, pursuant to 10 CFR §2.107, to withdraw its license amendment application to permit resumption of operation of the Humboldt Bay Power Plant, Unit No. 3 and to thereby terminate the proceeding without prejudice. The Licensing Board has not yet ruled on this motion.

Humboldt Bay Unit No. 3 does not meet current operational requirements, e.g. the ECCS analysis and evacuation plans are inadequate, and none of the post-TMI lessons learned requirements have been implemented. The licensee has completed studies relating to the costs and economics of returning the facility to power operation. The studies indicate that the potential costs of bringing the plant into compliance with current operational requirements are high when measured against the size of the facility and its remaining useful life. Uncertainty was also expressed by the licensee with regard to the NRC backfit requirement policy which could have a substantial impact on these costs.

Although there is fuel in the reactor vessel, calculations made by the NRC staff and the licensee show that the fuel now in the reactor vessel and in the spent fuel pool has decayed sufficiently such that, in the event of a loss of water, this fuel can be air-cooled. Thus, there is no significant safety problem associated with the plant in its present condition.

Nevertheless, since June 1976, Facility Operating License No. DPR-7 has been an "operating" license in name only. Since Humboldt Bay Unit 3 does not meet current operational requirements and no plans have been proposed to NRC by the licensee for bringing it into compliance with these requirements, it appears that the useful life of Unit 3 as an operating nuclear power reactor may be at an end.

IV.

Accordingly, in order to determine whether the operating authority in License No. DPR-7 should be revoked, the licensee is requested to submit information pursuant to section 182 of the Atomic Energy Act and 10 CFR 50.54(f) within 30 days of the date of this request which states whether or not the licensee plans to bring the Humboldt Bay facility into compliance with current operational requirements and, if so, describes these plans and provides a schedule therefor. If the licensee has not decided whether or not to make the Humboldt Bay facility operational again, the licensee is requested to identify the time when it intends to make such a decision, the reasons for delaying a decision until that time and the reasons why the operating authority for the Humboldt Bay facility should not be revoked pending that decision.

The staff will consider the licensee's response to this request for information to determine in the near future whether the operating authority of the Humboldt Bay facility should be revoked.