



January 23, 2020  
DPG 20-007

Attn: Document Control Desk  
Director, Division of Fuel Management  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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

**REQUEST FOR MINOR EDITORIAL AND CLARIFICATION REVISIONS FOR  
THE TECHNICAL REVIEW OF THE APPLICATION FOR RENEWAL OF THE  
RANCHO SECO INDEPENDENT SPENT FUEL STORAGE INSTALLATION  
LICENSE NO. SNM-2510 (CAC/EPID NOS. 001028/L-2018-RNW-0005;  
000993/L-2018-LNE-0004)**

*Reference: Conversation record NRC FORM 699 (12-5-2019 call with SMUD  
regarding proposed license conditions (001028/L-2018-RNW-0005))*

Dear Ms. Andrea Kock,

This submittal provides revisions requested by SMUD to update certain technical specifications associated with the SNM-2510 license renewal application currently under technical review by the NRC. These revisions reflect changes to the Rancho Seco Independent Spent Fuel Storage Installation organization and management titles, as well as updating of titles to licensing bases documents referenced within the license and technical specifications.

NM5526  
NM5520

**TS 4.1:** Add "former" before the reference to the site location "Rancho Seco Nuclear Generating Station (RSNGS) site."

**TS 4.2.1:** Change the number of DSCs from 21 to 22. There are 22 DSCs stored at the Rancho Seco ISFSI. Twenty-one of the DSCs contain spent fuel; one DSC contains GTCC waste.

**TS 4.2.2:** Change to "The Rancho Seco ISFSI can accommodate all of Rancho Seco's 493 spent fuel assemblies and Greater than Class C radioactive waste. The ISFSI storage capacity consists of 18 FC-DSC's, 2 FO-DSC's, 1 FF-DSC, and 1 GTCC DSC."

**TS 5.1:** Change the title, "The Manager, Plant Closure and Decommissioning (MPC&D)" to "The Manager, Rancho Seco Assets (MRSA)" in 2 places.

**TS 5.2:** Change the reference, "Defueled Safety Analysis Report (DSAR)" to "ISFSI Final Safety Analysis Report (IFSAR)."

Delete "SMUD will operate the Rancho Seco ISFSI under the same organization responsible for the Rancho Seco Nuclear Generating Station."

**TS 5.2:** Change the title, "General Manager (GM)" to "Chief Executive Officer & General Manager (CEO & GM)."

Change the title, "senior site manager" to "Manager, Rancho Seco Assets."

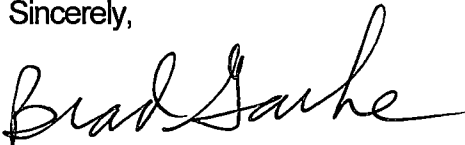
**TS 5.5:** Change the text to reflect the termination of the 10 CFR 50 license: "The managerial and administrative controls for the conduct of operations at the Rancho Seco ISFSI, built upon the RSNGS organization under the former 10 CFR 50 license, include the requirements of the 10 CFR 72 license." And "With the termination of the 10 CFR 50 license, appropriate 10 CFR 72.48 reviews will ensure continued compliance with the Rancho Seco ISFSI license requirements. SMUD will maintain the appropriate administrative and managerial controls at the Rancho Seco ISFSI until the DOE takes title to the fuel."

**TS 5.5.1:** Change "SAR" to "Rancho Seco IFSAR"

SMUD is submitting this request for the Rancho Seco LRA under oath or affirmation (Enclosure 1). Accordingly, pursuant to 10 CFR 72.16(b), I declare under penalty of perjury that the information contained in SMUD letter DPG 20-007, "REQUEST FOR MINOR EDITORIAL AND CLARIFICATION REVISIONS FOR THE TECHNICAL REVIEW OF THE APPLICATION FOR RENEWAL OF THE RANCHO SECO INDEPENDENT SPENT FUEL STORAGE INSTALLATION LICENSE NO. SNM-2510 (CAC/EPID NOS. 001028/L-2018-RNW-0005; 000993/L-2018-LNE-0004)" is true and correct to the best of my knowledge.

Should you have questions or require additional information, Please contact me directly at (916) 732-4812 or Brad.Gacke@smud.org.

Sincerely,



Brad Gacke, Manager  
Rancho Seco Assets

Enclosure:

1. California All Purpose Acknowledgment of SMUD Affirmation Pursuant to 10 CFR 72.16(b)

Cc:

Kristina Banovac, NRC

William Allen, NRC

Dan Doyle, NRC

Administrator, NRC Region IV

Radiological Health Branch of the California State Department of Health Services

CALIFORNIA ACKNOWLEDGMENT

CIVIL CODE § 1189

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State of California
County of Sacramento
On January 23, 2020 before me, Lauren Evans, Notary
Date Here Insert Name and Title of the Officer
personally appeared Brad Gacke
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature [Handwritten Signature]
Signature of Notary Public

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OPTIONAL

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Description of Attached Document

Title or Type of Document: Letter to NRC, DPG 20-007

Document Date: January 23, 2020 Number of Pages: 3

Signer(s) Other Than Named Above: N/A

Capacity(ies) Claimed by Signer(s)

Signer's Name: Brad Gacke

- Corporate Officer - Title(s)
Partner - Limited General
Individual Attorney in Fact
Trustee Guardian or Conservator
Other: Manager Rancho Seco
Signer is Representing: SMUD

Signer's Name:

- Corporate Officer - Title(s)
Partner - Limited General
Individual Attorney in Fact
Trustee Guardian or Conservator
Other:
Signer is Representing: