



70-754

GE Nuclear Energy

General Electric Company
Vallecitos Nuclear Center
P.O. Box 460, Vallecitos Road
Pleasanton, CA 94566

April 5, 1994

Robert C. Pierson, Chief
Licensing Branch
Division of Fuel Cycle Safety and Safeguards
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Reference: License SNM-960, Docket 70-754

Dear Mr. Pierson:

The General Electric Company, Vallecitos Nuclear Center (VNC) requests that Section 10.0, "Effluent and Environmental Sampling", be eliminated from Appendix A to License SNM-960.

Section 10.0 was added to Appendix A during the review for renewal of the license. The project manager at the time noted that the existing license required VNC to have a system of standards for radiological safety, but there was no requirement that they be followed. Accordingly, they were not auditable. The reviewer felt that although the information now contained in Section 10.0 was contained in the VNC standards and procedures, it should be placed in the license and made auditable. VNC complied with this request.

Before the license review was completed, a new NRC project manager was appointed. The new reviewer and the Region V inspector felt that the license should contain conditions requiring both the establishment of standards and procedures and that they be followed. As a result, License Condition S-9 which requires the establishment, maintenance, and following of procedures for carrying out licensed activities was added, and Section 4.5 of Appendix A was revised to require the establishment of standards, emergency procedures, and standard operating procedures and to require compliance with them. A matrix for preparation, review and approval of these documents also was added.

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All of the material in Section 10.0 is already contained in established standards and procedures. In fact, Section 10.0 was generated directly from existing standards and procedures. As VNC's standards and procedures are now auditable, Section 10.0 is redundant and should be removed from Appendix A.

A revised page ii to the table of contents for Appendix A is attached.

If you or your staff have any questions concerning this request, please contact me at (510) 862-4330. Thank you.

Sincerely,



G. E. Cunningham
Senior Licensing Engineer

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Attachment

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Revised page ii to Appendix A to License SNM-960

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Reference: **License SNM-960, Docket 70-754**

Dear Mr. Pierson:

The General Electric Company, Vallecitos Nuclear Center (VNC) requests that Section 10.0, "Effluent and Environmental Sampling", be eliminated from Appendix A to License SNM-960.

Section 10.0 was added to Appendix A during the review for renewal of the license. The project manager at the time noted that the existing license required VNC to have a system of standards for radiological safety, but there was no requirement that they be followed. Accordingly, they were not auditable. The reviewer felt that although the information now contained in Section 10.0 was contained in the VNC standards and procedures, it should be placed in the license and made auditable. VNC complied with this request.

Before the license review was completed, a new NRC project manager was appointed. The new reviewer and the Region V inspector felt that the license should contain conditions requiring both the establishment of standards and procedures and that they be followed. As a result, License Condition S-9 which requires the establishment, maintenance, and following of procedures for carrying out licensed activities was added, and Section 4.5 of Appendix A was revised to require the establishment of standards, emergency procedures, and standard operating procedures and to require compliance with them. A matrix for preparation, review and approval of these documents also was added.

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All of the material in Section 10.0 is already contained in established standards and procedures. In fact, Section 10.0 was generated directly from existing standards and procedures. As VNC's standards and procedures are now auditable, Section 10.0 is redundant and should be removed from Appendix A.

A revised page ii to the table of contents for Appendix A is attached.

If you or your staff have any questions concerning this request, please contact me at (510) 862-4330. Thank you.

Sincerely,



G. E. Cunningham
Senior Licensing Engineer

/ca

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Reference: **License SNM-960, Docket 70-754**

Dear Mr. Pierson:

The General Electric Company, Vallecitos Nuclear Center (VNC) requests that Section 10.0, "Effluent and Environmental Sampling", be eliminated from Appendix A to License SNM-960.

Section 10.0 was added to Appendix A during the review for renewal of the license. The project manager at the time noted that the existing license required VNC to have a system of standards for radiological safety, but there was no requirement that they be followed. Accordingly, they were not auditable. The reviewer felt that although the information now contained in Section 10.0 was contained in the VNC standards and procedures, it should be placed in the license and made auditable. VNC complied with this request.

Before the license review was completed, a new NRC project manager was appointed. The new reviewer and the Region V inspector felt that the license should contain conditions requiring both the establishment of standards and procedures and that they be followed. As a result, License Condition S-9 which requires the establishment, maintenance, and following of procedures for carrying out licensed activities was added, and Section 4.5 of Appendix A was revised to require the establishment of standards, emergency procedures, and standard operating procedures and to require compliance with them. A matrix for preparation, review and approval of these documents also was added.

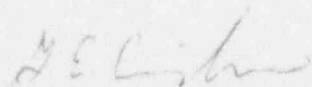
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All of the material in Section 10.0 is already contained in established standards and procedures. In fact, Section 10.0 was generated directly from existing standards and procedures. As VNC's standards and procedures are now auditable, Section 10.0 is redundant and should be removed from Appendix A.

A revised page ii to the table of contents for Appendix A is attached.

If you or your staff have any questions concerning this request, please contact me at (510) 862-4330. Thank you.

Sincerely,



G. E. Cunningham
Senior Licensing Engineer

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Revised page ii to Appendix A to License SNM-960

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Robert C. Pierson, Chief
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Office of Nuclear Material Safety and Safeguards
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Reference: **License SNM-960, Docket 70-754**

Dear Mr. Pierson:

The General Electric Company, Vallecitos Nuclear Center (VNC) requests that Section 10.0, "Effluent and Environmental Sampling", be eliminated from Appendix A to License SNM-960.

Section 10.0 was added to Appendix A during the review for renewal of the license. The project manager at the time noted that the existing license required VNC to have a system of standards for radiological safety, but there was no requirement that they be followed. Accordingly, they were not auditable. The reviewer felt that although the information now contained in Section 10.0 was contained in the VNC standards and procedures, it should be placed in the license and made auditable. VNC complied with this request.

Before the license review was completed, a new NRC project manager was appointed. The new reviewer and the Region V inspector felt that the license should contain conditions requiring both the establishment of standards and procedures and that they be followed. As a result, License Condition S-9 which requires the establishment, maintenance, and following of procedures for carrying out licensed activities was added, and Section 4.5 of Appendix A was revised to require the establishment of standards, emergency procedures, and standard operating procedures and to require compliance with them. A matrix for preparation, review and approval of these documents also was added.

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All of the material in Section 10.0 is already contained in established standards and procedures. In fact, Section 10.0 was generated directly from existing standards and procedures. As VNC's standards and procedures are now auditable, Section 10.0 is redundant and should be removed from Appendix A.

A revised page ii to the table of contents for Appendix A is attached.

If you or your staff have any questions concerning this request, please contact me at (510) 862-4330. Thank you.

Sincerely,



G. E. Cunningham
Senior Licensing Engineer

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Reference: **License SNM-960, Docket 70-754**

Dear Mr. Pierson:

The General Electric Company, Vallecitos Nuclear Center (VNC) requests that Section 10.0, "Effluent and Environmental Sampling", be eliminated from Appendix A to License SNM-960.

Section 10.0 was added to Appendix A during the review for renewal of the license. The project manager at the time noted that the existing license required VNC to have a system of standards for radiological safety, but there was no requirement that they be followed. Accordingly, they were not auditable. The reviewer felt that although the information now contained in Section 10.0 was contained in the VNC standards and procedures, it should be placed in the license and made auditable. VNC complied with this request.

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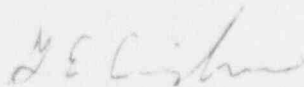
9404130167 4pp.

All of the material in Section 10.0 is already contained in established standards and procedures. In fact, Section 10.0 was generated directly from existing standards and procedures. As VNC's standards and procedures are now auditable, Section 10.0 is redundant and should be removed from Appendix A.

A revised page ii to the table of contents for Appendix A is attached.

If you or your staff have any questions concerning this request, please contact me at (510) 862-4330. Thank you.

Sincerely,



G. E. Cunningham
Senior Licensing Engineer

/ca

Attachment

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Revised page ii to Appendix A to License SNM-960

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