

Docket 70-754
License SNM-960

APR 21 1994

Mr. Gene E. Cunningham
Senior Licensing Manager
General Electric Company
Vallecitos Nuclear Center
P. O. Box 460
Vallecitos Road
Pleasanton, CA 94566

Dear Mr. Cunningham:

SUBJECT: SECTION 10.0, "EFFLUENT AND ENVIRONMENTAL SAMPLING" (TAC NO. L30664)

This is in response to your letter of April 5, 1994, requesting that Section 10.0, "Effluent and Environmental Sampling," be eliminated from Appendix A to Materials License SNM-960.

We have considered your request and have determined that Section 10.0 continues to be relevant. We agree with your premise that commitments to having procedures and standards may create redundancies in the site licensing documentation and your operating license. As a matter of fact, we would expect such redundancies to occur since procedures and standards should reflect and amplify license commitments. In addition, procedures not only amplify license commitments but contain related supporting information by which your site is operated in a safe manner.

Accordingly, your request for the removal of Section 10.0 "Effluent and Environmental Sampling" is hereby denied in accordance with 10 CFR 2.103(b) in that the requested action may be inimical to the health and safety of the public and does not meet the intent of regulatory requirements. You may request a hearing with respect to this denial within 20 days of the date of this letter. If you wish to request a hearing, submit a request to the Director, Division of Fuel Cycle Safety and Safeguards, Nuclear Regulatory Commission, Washington, D.C. 20555.

If you have any questions regarding this licensing action, please contact the Project Manager, Mr. Charles E. Gaskin, at (301) 504-2649 or after May 6th at (301) 415-2649.

Sincerely,
ORIGINAL SIGNED BY
Robert C. Pierson
Robert C. Pierson, Chief
Licensing Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

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Distribution: (Control No. 140S)
Docket 70-754 PDR
MMessier, LFDCB ECSS r/f
JRoth, FCOB NMSS r/f

NRC File Center Region IV
FCLB r/f FCLS1 r/f

*see previous concurrence

[G:\GEV04051.94]

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NAME	CGaskin*:cw	DAHoadley*	EKeegan*	CWEmeigh*	RCPierson	
DATE	04/21/94	04/20/94	04/21/94	04/21/94	04/21/94	

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This is in response to your letter of April 5, 1994, requesting that Section 10.0, "Effluent and Environmental Sampling" be eliminated from Appendix A to Materials License SNM-960.

We have considered your request and have determined that Section 10.0 continues to be relevant. We agree with your premise that commitments to having procedures and standards may create redundancies in the site licensing documentation and your operating license. As a matter of fact, we would expect such redundancies to occur since procedures and standards should reflect and amplify license commitments. In addition, procedures not only amplify license commitments but contain related supporting information by which your site is operated in a safe manner.

Accordingly, your request for the removal of Section 10.0 "Effluent and Environmental Sampling" is hereby denied in accordance with 10 CFR 2.103(b) in that the requested action may be inimical to the health and safety of the public and does not meet the intent of regulatory requirements. You may request a hearing with respect to this denial within 20 days of the date of this letter. If you wish to request a hearing, submit a request to the Director, Division of Fuel Cycle Safety and Safeguards, Nuclear Regulatory Commission, Washington, D.C. 20555.

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OFC	FCLB	E	FCLB	E	FCLB	E	FCLB	C	FCLB	C		
NAME	CGaskin: CW		DAHoadley		EKeegan		CWEmigh		RCPierson			
DATE	04/21/94		04/20/94		04/21/94		04/21/94		04/21/94			

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