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To: Ira.Schneider@cdph.ca.gov
Cc: [Watson, Bruce](#); [Achten, Sarah](#); [Quintero, Jessie](#); gonzalo.perez@cdph.ca.gov; [Chapman, Greg](#)
Subject: Consultation with State of California RE: Amendment Application - Revision of Humboldt Bay Power Plant Unit 3 License Termination Plan
Date: Monday, June 07, 2021 10:12:00 AM
Attachments: [2021-07632.pdf](#)
[FEB 8 Application.pdf](#)
[APril 29 RAI response.pdf](#)
[May 20 HBPP Supplemental RAI Response.pdf](#)

RESENT- date correction for FRN publication date.
See below.

Thank you

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Ira Schneider, Supervising Health Physicist
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Dear Mr. Schneider,

I am the NRC Project Manager for Humboldt Bay Power Plant, Unit 3 (HBPP). Pacific Gas and Electric Company (PG&E), the licensee, submitted a license application request (LAR) on February 8, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21039A515), as supplemented on April 29, 2021 (ADAMS Accession No. ML21119A214) and May 20, 2021 (ADAMS Accession No. ML21140A395). I have attached the application for your convenience.

PG&G proposes, in its LAR, to revise the HBPP License Termination Plan (LTP). The proposed revisions to the LTP include the following:

- Deleting information associated with developing surrogate ratios;
- Deleting the deselection process currently described in LTP, Section 6.2.5; and
- Adding a new methodology for determining dose contribution from deselected Hard-to-Detect radionuclides.

We are near completion of this amendment application review. The proposed no significant hazards consideration determination was noticed in the *Federal Register* on April 20, 2021 (86 FR 20526). I am providing a copy of the *Federal Register* Notice (FRN), attached, per 10 CFR 50.91 (b)(2). The proposed no significant hazard determination is addressed by the licensee its application (submittal on February 8, 2021 (ADAMS) Accession No. ML21039A515, in the Enclosure, at Section 4.3) and the NRC's proposed no significant determination is addressed in the FRN (attached). Also, we are considering that a Categorical Exclusion would apply because we believe that it would meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22 (c)(9) and 10 CFR 51.22(c)(10) (ii). We are considering finalizing these determinations.

If the State of California has comments on this license amendment request/No Significant Hazards proposed determination, please e-mail me your comments or provide an email if you have no comments by the close of business by June 21, 2021. If you have any questions, please contact me. My contact information is below.

Thank you.

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