



**Pacific Gas and
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PG&E Letter HBL-14-012

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

10 CFR 50.90
10 CFR 50.82 (a)(9)

Docket No. 50-133, License No. DPR-7
Humboldt Bay Power Plant, Unit 3
Humboldt Bay Power Plant, Unit 3, License Termination Plan Technical Basis
Documents

Dear Commissioners and Staff:

On May 3, 2013, Pacific Gas and Electric Company (PG&E) submitted a proposed License Termination Plan (LTP) for Humboldt Bay Power Plant (HBPP), Unit 3, in PG&E Letter HBL-13-007, "License Amendment Request 13-01, Addition of License Condition 2.C.5, 'License Termination Plan.'" Also on May 3, 2013, PG&E submitted PG&E Letter HBL-13-008, "Humboldt Bay Power Plant, Unit 3, License Termination Plan Supplemental Information" that provided five technical basis documents (TBDs) to aid in the NRC review of the LTP.

On December 24, 2013, the NRC sent PG&E a Request for Additional Information (RAI) based on NRC review of the HBPP, Unit 3, LTP. PG&E submitted responses to the NRC RAIs on February 14, 2014 (PG&E Letter HBL-14-008), on April 2, 2014 (email from David Sokolsky to John Hickman) and on May 13, 2014 (PG&E Letter HBL-14-007). As a result of the RAIs, PG&E has revised two of the five TBDs that are included in the following two enclosures to aid in the NRC review of the LTP:

Enclosure 1, "Gross Activity DCGL in Support of the Final Status Survey at HBPP," Revision 1, approval date July 9, 2014

Enclosure 2, "Radionuclide Selection for DCGL Development," Revision 1, approval date July 9, 2014

On September 24, 2013, PG&E submitted PG&E Letter HBL-13-011, "Humboldt Bay Power Plant, Unit 3, License Termination Plan Technical Basis Document" that included a TBD titled "Derived Concentration Guideline Levels for Embedded and Buried Piping in Support of the Final Status Survey at HBPP," dated August 15, 2013. The submittal was made in accordance with HBPP LTP Section 5.3.6.3.2 requiring NRC review and approval prior to implementation.



As a result of the NRC RAIs, PG&E has revised the embedded and buried piping TBD to include:

1. An update to include all buried piping currently identified to remain in place.
2. Addressing RESRAD parameters identified as sensitive through the use of 25th and/or 75th percentile values as appropriate.
3. A contaminated zone, which adds approximately 20 percent conservatism to the modeling.
4. Using input values for contaminated fractions for plant food, meat, and milk that are consistent with the area-adjusted values in HBPP LTP Chapter 6, Attachment ENG-HB-005.

As a result, PG&E is submitting Enclosure 3, "Derived Concentration Guideline Levels for Embedded and Buried Piping in Support of the Final Status Survey at HBPP," Revision 1, approval date July 16, 2014, for NRC review and approval prior to the implementation of buried piping DCGLs.

PG&E makes no new or revised regulatory commitments (as defined by NEI 99-04) in this letter.

If you wish to discuss the information in the enclosure, please contact Mr. William Barley at (707) 444-0856.

I state under penalty of perjury that the foregoing is true and correct.

Executed on August 15, 2014.

Sincerely,

Edward D. Halpin
Senior Vice President and Chief Nuclear Officer

Enclosures

cc: HBPP Humboldt Distribution
cc/enc: Marc L. Dapas, NRC Region IV Administrator
John B. Hickman, NRC Project Manager
Gonzalo L. Perez, California Department of Public Health