GE Hitachi Nuclear Energy

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~~Security Related~~ Information Notice
The Attachment to this letter contains ~~security related information which is to be withheld from public disclosure in accordance with 10CFR2.390 and RIS 2005-31.~~ The remainder of this letter can be made public upon removal of the Attachment.

SPM 15-020

July 10, 2015

Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

ATTN: Document Control Desk

Subject: GEH Vallecitos Nuclear Center (VNC) Request for Alternate Decommissioning Schedules for DPR-1, DR-10 and TR-1 Licenses

References:
1) NRC License DPR-1, Vallecitos Boiling Water Reactor (VBWR), Docket 50-18
2) NRC License DR-10, ESADA Vallecitos Experimental Superheat Reactor (EVESR), Docket 50-183
3) NRC License TR-1, General Electric Test Reactor (GETR), Docket 50-70
4) NRC License R-33, Nuclear Test Reactor (NTR), Docket 50-73
5) Letter, Mendonca (NRC) to Stimmell (GE), "Issuance of Amendment No. 16 to Facility License No. TR-1 for the General Electric Test Reactor, 9/30/92 (ML071350585)

Dear Sir or Madam:

This request by GE Hitachi Nuclear Energy Americas LLC (GEH) is for an alternate decommissioning schedule for shut down reactor licenses DPR-1, DR-10 and TR-1. An alternate schedule will ensure there is an integrated approach to reactor facility decommissioning at the VNC site as originally established in Reference 5. As explained below, the purpose of this request is to allow an alternate schedule to decommission these shut down reactor facilities to conform to current NRC practice and policy which encourages a risk informed approach to nuclear decommissioning and remediation.

GEH is the holder of NRC Licenses DPR-1 (VBWR), DR-10 (EVESR), TR-1 (GETR) and R-33 (NTR) licensed reactor facilities at the VNC site. The VBWR, EVESR and GETR facilities have permanently ceased operations and are being maintained in a possession only status.

DPR-1 The VBWR is a 50 MW thermal experimental research reactor initially licensed in 1957. It was shut down on December 9, 1963 for an extended period of time and subsequently deactivated. All fuel has been removed from the reactor and shipped offsite. In addition, much of the equipment used to operate the reactor (nuclear instrumentation, control rod drives, pumps, etc.) has been removed. On September 9, 1965, the AEC amended DPR-1 license to possess,

but not operate, the facility in the condition described in the Final Report on Deactivation dated February 5, 1965. The NRC, in amendment 19, subsequently extended the license until May 14, 1996. The VBWR license expired on May 14, 1996 and pursuant to 10 CFR 50.51(b) continues in effect authorizing ownership, possession, control and maintenance of the facility.

DR-10 The EVESR is a 17 MW thermal experimental research reactor initially licensed in 1963. It was shut down on February 1, 1967 and subsequently deactivated. All fuel and other special nuclear material for the EVESR has been removed and shipped offsite. In addition, much of the equipment used to operate the reactor (nuclear instrumentation, control rod drives, pumps, etc.) has been removed. On June 17, 1968, the AEC amended DR-10 license to possess, but not operate, the facility in the condition described in the EVESR Deactivation Report dated October 12, 1967. The current EVESR license expiration date is January 26, 2016.

TR-1 The GETR is a 50 MW thermal experimental test, development and isotope production reactor initially licensed to operate in 1959. It was shutdown in 1977 and subsequently deactivated. All fuel and isotope production targets containing special nuclear material have been removed from the facility and shipped offsite. The current GETR license expiration date is January 26, 2016.

R-33 The NTR is a 100 kW thermal experimental test reactor currently used for non-destructive material imaging. The current NTR license expiration date is April 20, 2021. Because of unique NTR imaging capabilities, it is anticipated that GEH will request that the R-33 license be renewed to allow for an additional twenty years of operation until April 2041.

In order to ensure an integrated approach to site decontamination and remediation, an alternate decommissioning schedule, until April 2041, is requested for shutdown reactor licenses DPR-1 (VBWR), DR-10 (EVESR), TR-1 (GETR). This date is anticipated to be consistent with the ultimate shutdown of the NTR facility and termination of the CA agreement state materials license at the site.

This request is consistent with the site specific factors affecting the capability to carry out decommissioning to be considered in the delay of decommissioning in 10 CFR 50.82(a)(3) and 50.82(b)(4)(i). These factors include the presence of another operating non-power reactor facility as well as other ongoing operating nuclear facilities.

The Attachment to this letter provides additional site specific safety and security factors affecting the capability to carry out shutdown reactor decommissioning.

The requested alternate decommissioning schedule for the shutdown reactor licenses would also allow for a risk informed and balanced approach to the remediation and decommissioning effort for all nuclear facilities at the VNC site. The requested alternate schedule is expected to reduce the overall environmental impact and result in a benefit to the public health and safety.

GEH has responsibility for the safe decommissioning of the VNC site under current NRC and CA State licenses. Financial assurance for decommissioning of VNC licensed activities is provided on an ongoing basis in the form of a General Electric Company (GE) parent guarantee pursuant to NRC regulations. This guarantee is issued to provide assurance funds will be available when needed for required remediation and decommissioning activities. GE provides

financial assurance documentation and demonstrates passage of the required financial test on an annual basis.

Based on the above considerations, GEH requests that an alternate decommissioning schedule be approved to allow the shutdown reactor facilities to continue to be safely maintained in a possession only mode until cessation of other licensed activities at the site.

GEH posits:

1) The proposed alternate schedule does not involve a significant increase in the probability or consequences of accidents previously evaluated or involve a significant reduction in a safety margin,

2) The proposed alternate schedule does not create or involve a significant hazards consideration,

3) There is reasonable assurance that the health and safety of the public will not be endangered by the proposed alternate schedule,

4) Ongoing survey, control and maintenance activities at the site will be conducted in accordance with NRC regulations and existing license conditions, and

5) NRC approval of the proposed alternate schedule will not be adverse to the common defense and security or health and safety of the public.

Please contact me on (910) 819-5950, if you have any questions or would like to discuss this matter further.

Sincerely,

Scott P. Murray, Manager
Facility Licensing

Commitments: None

Attachment: VNC Site Specific Safety and Security Considerations (Contains Security Related Information)

Cc: B. Watson, USNRC NMSS
J. Parrott, USNRC NMSS
B. Reilly, USNRC NMSS
D. Hardesty, USNRC NRR
R. Evans, USNRC RIV