



UNITED STATES^o
NUCLEAR REGULATORY
REGION IV
1600 E. LAMAR BLV
ARLINGTON, TX 76011

N

December 17, 2015

Mr. Edward D. Halpin, Senior Vice President
& Chief Nuclear Officer
Pacific Gas and Electric Company
P. O. Box 3
Mail Code 104/6/601
Avila Beach, CA 93424

SUBJECT: HUMBOLDT BAY POWER PLANT - NRC INSPECTION REPORT
050-00133/15-010

Dear Mr. Halpin:

This letter refers to the U.S. Nuclear Regulatory Commission (NRC) inspection conducted on October 27-29, 2015, at your permanently shut down Humboldt Bay Power Plant, Unit 3 facility in Eureka, California. The purpose of the inspection was to determine whether decommissioning activities were being conducted safely and in conformance with the U.S. Nuclear Regulatory Commission (NRC) requirements. Preliminary results of the inspection were discussed with members of your staff at the conclusion of the onsite inspection on October 29, 2015, and during a follow up telephonic exit on November 19, 2015.

During this inspection, NRC staff examined activities conducted under your license as they relate to public health and safety to confirm compliance with the Commission's rules and regulations, and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel. The enclosed report presents the results of this inspection. No violations were identified and no response to this letter is required.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's documents system (ADAMS), accessible from the NRC's Web site at <https://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction.

Should you have any questions concerning this inspection, please contact Dr. Gerald Schlapper, Health Physicist, at 817-200-1273 or the undersigned at 817-200-1191.

Sincerely,

/RA R. Browder for/

Ray L. Kellar, P. E., Chief
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

Docket No: 050-00133

License No: DPR-7

Enclosure:

NRC Inspection Report 050-00133/15-010

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**U. S. NUCLEAR REGULATORY COMMISSION
REGION IV**

Docket: 050-00133

License: DPR-7

Report: 050-00133/15-010

Licensee: Pacific Gas and Electric Company

Facility: Humboldt Bay Power Plant, Unit 3

Location: 1000 King Salmon Avenue
Eureka, California 95503

Dates: October 27-29, 2015

Inspector: Gerald A. Schlapper, PhD, CHP, Health Physicist
Fuel Cycle and Decommissioning Branch

Donald L. Stearns, Health Physicist, Inspector
Fuel Cycle and Decommissioning Branch

Approved by: Ray L. Kellar, P. E., Chief
Fuel Cycle and Decommissioning Branch
Division of Nuclear Material Safety

Enclosure

EXECUTIVE SUMMARY

Humboldt Bay Power Plant, Unit 3 NRC Inspection Report 050-00133/15-010

This inspection was a routine, announced inspection of decommissioning activities being conducted at the Humboldt Bay Power Plant (HBPP), Unit 3 facility. In summary, the licensee was conducting site activities in compliance with regulatory and license requirements.

Safety Reviews, Design Changes and Modifications

The licensee continued to conduct safety reviews by the Plant Safety Review Committee (PSRC). The committee continued its review of design changes and modifications to include where applicable procedural changes. (Section 1.2)

Self-Assessment, Auditing, and Corrective Action

The licensee conducted audits, self-assessments and corrective actions in accordance with procedures and regulatory requirements. (Section 2.2)

Maintenance and Surveillance

The licensee maintained adequate radiation protection instrumentation for conduct of decommissioning activities. Status of decommissioning activities has eliminated the need for the stack monitor system. (Section 3.2)

Decommissioning Performance and Status Review

The licensee conducted decommissioning activities in accordance with license and regulatory requirements. (Section 4.2)

Solid Radioactive Waste Management and Transportation of Radioactive Materials

The licensee conducted solid waste management and transportation activities in accordance with procedures and regulatory requirements. A minor concern was noted related to inclusion of documentation with a limited number of shipments. (Section 5.2)

REPORT DETAILS

Summary of Plant Status - Unit 3

At the time of the inspection, the licensee continued to conduct decommissioning of remaining structures and areas around the site, including equipment removal, building demolition, and excavation. Decommissioning was performed in accordance with the general guidance provided in the Post-Shutdown Decommissioning Activities Report (PSDAR) dated July 19, 2013, (ADAMS Accession No. ML13213A160).

A License Termination Plan (LTP) was submitted to the U.S. Nuclear Regulatory Commission (NRC) on May 3, 2013, and was followed with submittals in response to NRC requests for additional information (ML131300009, ML131300160). On August 13, 2014, LTP Revision 1, which included information based on the above submittals, was submitted (ML14246A164). This plan will further define the site remediation process and the final status surveys used to demonstrate unrestricted use of the site and to support license termination. In addition, the plan will refine decommissioning cost estimates and thereby provide a detailed baseline for cost and schedule considerations.

The contractor for the civil works portion of the decommissioning, Chicago Bridge and Iron (CB&I), continues to prepare the remaining portions of the reactor building and the spent fuel building for demolition. All segments of the pressure vessel, including the lower head and the upper vessel flange, have been removed from the reactor building and shipped to a waste site for burial. The licensee continues to transport other waste to appropriate disposal sites. The licensee continues the process of analyzing the feasibility and cost associated with removal of subsurface structures as part of the decommissioning process.

1 Safety Reviews, Design Changes, and Modifications (37801)

1.1 Inspection Scope

The inspector evaluated the licensee's program of safety reviews to ensure that the program is effective. The inspector also reviewed facility design changes and modifications.

1.2 Observations

The inspector reviewed the current organizational structure of the licensee and the primary support contractor. As work changes from self-directed activities to licensee oversight of contractor-supervision activities, then emphasis on certain functions will change. For example, as radioactive material is removed and dose rates are reduced to background levels, the licensee plans to make significant changes in the radiation protection program. By the end of the year the licensee has determined that access control will no longer be required and personal dosimeters will no longer be issued. Area badges will be employed to estimate potential for employee exposure. The licensee has already placed area monitoring dosimeters in appropriate locations and has accumulated data for two quarters of operation. Results of these measurements were reviewed by the inspector who noted that all results were essentially at background levels and hence future exposures, if any, would be a small fraction of the dose limits for occupational

workers and monitoring would no longer be required. In addition, there will no longer be a need for radiation work permits. As a result, training will be scaled back to some degree since there will be less need for emphasis on protection from alpha contamination and potential for internal and external exposures. The reduced requirements in the radiation protection area is reflected in a projected decrease in radiation protection staffing by the end of 2015.

The inspectors reviewed actions by the Plant Staff Review Committee (PSRC) as outlined in minutes of the committee's meetings. The inspectors also attended a meeting of the PSRC that was held during the period of the inspection. Establishment of a quorum of qualified individuals was noted. The meetings were initiated with a safety message, related to the rapidly changing conditions at the site. Much of the discussion related to the transfer of responsibilities and requirements from the Unit 3 Part 50 license to the ISFSI Part 72 license. Impacts in Emergency Planning and Procedures and Quality Assurance programs were noted. Committee action and approval was timely as the licensee needs to complete actions no later than December 22, 2015 to meet implementation deadlines of the NRC approved License Amendment Request (LAR).

The Humboldt Bay Power Plant Quality Assurance Plan (QAP) addresses requirements of the Humboldt Bay Unit 3 Part 50 License and the Independent Spent Fuel Storage Installation (ISFSI) Part 72 License. By letter dated June 10, 2014, (ML14176A080) the licensee submitted revision 32 to the QAP, which changed the oversight of the QA Program from the Nuclear Safety Oversight Committee (NSOC) to a requirement for an Independent Management Review function. In response to a request from NRC, the licensee submitted additional information by letter dated August 15, 2014 (ML14227A958). The NRC approved the request for change to QAP on September 4, 2014 (ML14238A627). Implementation of the change is through Procedure HBAP, Independent Management Review, effective September 4, 2014 that notes that the Chief Nuclear Officer is responsible for designating the reviewer(s) to assess the effectiveness of the QAP and other appropriate oversight activities at the site. The licensee is committed to conducting an effectiveness review at a minimum of every 2 years. The inspector noted that as of the dates of the inspection a review had not been conducted and the reviewer(s) had not been appointed. The appointment of a qualified reviewer and conduct of the review will be of continuing interest in future inspections.

1.3 Conclusions

The inspector concluded that there is adequately trained and qualified staff to conduct decommissioning activities at the site. The inspector reviewed the program for conduct of management safety reviews in light of changes to the Humboldt Bay QAP and found them to meet regulatory requirements.

2 Self-Assessment, Auditing and Corrective Action (40801)

2.1 Inspection Scope

The inspector reviewed the licensee's program for self-assessment, conduct of audits and continuation of corrective actions.

2.2 Observations

The inspector reviewed a quality verification short form assessment of the Special Nuclear Material (SNM) Inventory process (Assessment No. 15274002). This assessment addressed the physical inventory of spent fuel and reactor related Greater Than Class C (GTCC) waste currently stored at the Humboldt Bay ISFSI. The licensee's assessment identified that the inventory was conducted in accordance with approved procedures and the requirements outlined in 10 CFR 72 and the ISFSI FSAR Section 5.3 were met. The licensee's review noted that training and qualification of personnel was adequate to satisfy Regulatory and Licensing requirements; however, the procedural requirements impose a certification requirement on a broader group of reviewers than is required by regulation. Also discussed in the assessment was the fact that the procedure does not clearly define the requirements for certification. The inspector noted that the review was conducted within the allowed time limit of 12 months and that quality verification staff observed conduct of the inventory.

The inspector also selected for review an audit of the License Termination Plan (LTP) Final Status Survey (FSS) Quality Program requirements, File No. 150910023, that addressed the period April 7 through July 9, 2015. At the time of review by the licensee, the LTP was still under review by the NRC and as such, this review was initiated in order to assess readiness. The audit noted that while implementation of the program is effective overall, there is a need for a higher level of rigor in implementation of some programs. Areas for improvement were suggested in definition of training and qualification requirements, consistent implementation of administrative and quality program requirements and the impact of changes to plans and procedures. The audit noted that the program is fundamentally sound and that corrective actions to address the issues identified in the audit will facilitate the integration of requirements, administrative programs, implementing procedures and organizational structure. The inspector noted that the audit results contained a detailed list of deficiencies that were updated and tracked in the licensee's corrective action program.

With the change of programs and procedures associated with reassignment of responsibilities related the Unit 3 Part 50 license to the ISFSI Part 72 license, the site is involved with changes to its emergency plan, fire protection, quality assurance and access control programs. The inspector verified that the quality verification team was working to ensure timeliness of documentation of the program changes. The inspector noted in discussion with management and staff at the site that effort was required to ensure that procedural requirements were in line with organizational changes. The inspector noted that management was aware of the need for timely implementation and continued review and assessment of programs.

2.3 Conclusion

The inspector concluded that self-assessment programs and the conduct of audits complied with license and regulatory requirements.

3 **Maintenance and Surveillance (62801)**

3.1 Inspection Scope

The inspectors reviewed calibration and maintenance of the Main Plant Exhaust Fan (MPEF) and Stack Particulate Airborne Monitoring System (SPAMS). This system was removed from service on October 14, 2015, and physically removed from the plant in order to allow demolition of plant structures and installation of the Cutter Soil Mixture (CSM) wall. The inspectors also reviewed data supplied through the calibration database for portable radiation survey instruments.

3.2 Observations

The Main Plant Exhaust System and the SPAMS was the last plant system remaining in operation. All other plant systems have been shut down and removed from the buildings where they were located. The inspectors reviewed the status of SPAMS to ensure that the system continued to perform its function until the end of service. SPAMS was a continuous alpha-beta monitor system installed in the main plant exhaust duct and monitored gaseous release to the environment. The system allowed for collection of particulate on filter paper for subsequent isotopic analysis. The inspectors reviewed documentation of the analysis of these filters along with the most recent calibration of the monitor, which was performed on October 6, 2015. The analysis and calibration were found to have been performed in accordance with plant procedures.

Removal of the reactor pressure vessel, contaminated piping and components in the drywell allowed the licensee to attain a radioactive source term reduction that showed, through a calculation of exposure potential that was reviewed by the inspector, that open air demolition could be conducted. Since the exhaust system was no longer necessary, the system and monitoring equipment were removed from service on October 14, 2015, the date that the licensee began open air demolition of the eastern portion of the reactor and refuel building.

The licensee has a continuing need for use of portable radiation survey instruments. The inspectors reviewed survey instrument data through use of the calibration database for these instruments. Per procedure, the licensee uses color coding to track calibration due dates in the database. For example an instrument calibrated and in use is coded green. Once the instrument is due for calibration within 30 days, a yellow flag is coded in the database. If past due for calibration, the database entry is red flagged. This approach provides for quick assessment of instruments in the database. Instrument calibration is no longer performed on site. The instruments are either sent to a licensed vendor for calibration or to the NRC licensed program at the Diablo Canyon Nuclear Station for calibration.

3.3 Conclusions

The inspectors noted that the licensee's program for maintenance and calibration of the Main Plant Exhaust Fan and associated monitor system (SPAMS) were in compliance with applicable procedures and regulatory requirements. The inspectors also noted that through use of the calibration database and checks in the field of selected instruments that the instruments in use were within calibration dates. The inspectors validated that there were an adequate number and type of instruments for radiation protection requirements during decommissioning activities.

4 **Decommissioning Performance and Status Review (71801)**

4.1 Inspection Scope

The inspector evaluated whether the licensee and its contracted workforce were conducting decommissioning activities in accordance with license and regulatory requirements.

4.2 Observations

Primary efforts for the remaining months of calendar year 2015 are to complete asbestos abatement for the exterior of the reactor and spent fuel buildings in preparation for demolition of the buildings, placement of clean excavated material into the discharge canal, removal of the remaining components that contain residual radioactivity, continued installation of the CSM wall, and transport of construction debris to proper burial sites.

At the time of the inspection, installation of panels of the CSM wall was temporarily on hold due to a requirement to remove structures that prevented operation of the installation equipment. Each panel is approximately three feet wide and nine feet long and of varying depth. The CSM wall is constructed of 5 rings (A through E) with the outer E ring of depth that cuts into the clay layer and acts to cut off water flowing into the area below the reactor caisson. Soon after completion of the inspection, installation of the CSM wall sections resumed. Of the approximately 250 wall sections that are required, 76 sections had been completed by late November and completion of the wall is anticipated during the second quarter of 2016.

Demolition of the interior of the liquid waste building, and demolition of tunnels and piping connecting it to the reactor building was complete, including the Secondary Alarm Station (SAS) structure and associated off-gas tunnel. The concrete floor, concrete north wall still remain intact. The removal of the liquid waste building metal shell was completed on schedule. The solid waste building located just north of the liquid waste building has been demolished. The concrete floor of the solid waste building remained at the time of inspection and will be removed at a later date.

The discharge canal has been isolated from the bay. The removal of the rip rap material along the sides of the canal has been completed, with the exception of

the material at the extreme southern end of the canal. Ground water slowly seeps into the southern end of the discharge canal and is processed through a treatment system prior to allowing discharge to the bay. The Ground Water Treatment System (GWTS) is in the process of being expanded in anticipation of need for additional capacity. All excavated material including the rip rap material and material from the CSM wall is monitored for radioactivity prior to reuse or disposal.

The inspectors reviewed the setup and use of the detector system used to monitor trucks of excavated material. The system is composed of four detectors. Two detectors each are located in enclosed trailers on either side of a set of scales for the dump trucks hauling the material. The system, known as the Guardian System, has been calibrated to accommodate a variety of containers and trucks loaded with the excavated material. The volume and weight of material in the truck is measured to determine the density of the material. This parameter is entered into the counting system along with the type of truck and the trucks empty weight. Typically a 1000 second count is performed to determine the concentration of activity of the material in the truck. Once the count survey is completed, then the material is placed into the discharge canal at locations that have been previously declared and verified to be clean per Final Status Survey criteria. The licensee provided data that showed that through the end of October, 646 truckloads containing approximately 10,300 tons of soil had been placed in the canal location.

4.3 Conclusions

The licensee conducted decommissioning activities in accordance with license and regulatory requirements.

5 Solid Radioactive Waste Management and Transportation of Radioactive Materials (86750)

5.1 Inspection Scope

The inspector reviewed documentation associated with shipments of material to their respective burial sites. The shipments included solid waste shipments by truck of exempt material to a site approved for Resource Conservation and Recovery Act (RCRA) in Idaho, low specific activity solid waste shipment to a Utah burial site approved for low specific activity radioactive waste, and shipments utilizing a combination of truck and rail transport of low specific activity waste to Waste Control Specialists (WCS) in Texas. The review included documentation required by Department of Transportation regulations, and documentation of waste classification required by 10 CFR Part 20. The inspectors also verified that the licensee had the required import and export licenses for shipment and acceptance of the material.

5.2 Observations

To ensure compliance with applicable NRC and Department of Transportation (DOT) regulations, the licensee utilized a shipping compliance checklist. The checklist requires that the licensee have documentation on file to certify that any container

used meets package qualifications and that vendor provided procedures for use of the container were followed. The package qualification includes documentation that manifested information is consistent with the approved waste profile. Documents supplied in the package indicated that the container had been inspected by the licensee and determined to be in compliance with DOT packaging requirements. Radiation/contamination survey data sheets were noted that verified compliance with applicable limits as outlined in 10 CFR 71.47. Emergency response information was supplied with all shipments. Required direct radiation and contamination surveys verified compliance with DOT packaging requirements. A vehicle inspection checklist was completed prior to approval for the vehicle to depart the site. A review of documents for these selected shipments indicated that license and regulatory requirements were met. Prior to departure, a signature by the licensee, in its oversight role, is required to verify that all documents associated with the shipment have been completed in accordance with licensee procedures and that the material is packaged, characterized, classified, marked, labeled, placarded and transported in accordance with regulatory requirements of NRC and the DOT.

Beginning on September 2, 2015, the licensee began a trial program to evaluate the acceptability of shipping to an additional burial site. Specifically, shipments of low specific activity material to Waste Control Specialists (WCS) in Andrews, Texas. For each shipment to WCS, a total of 5 truck shipments are sent from Humboldt Bay to Redding, California, to a rail yard. At that point, the 5 truck loads are consolidated into a rail car and one shipment is made from Redding to the WCS site in Texas. Proper transportation and waste classification documentation accompanied the shipments from Redding, California, to the WCS burial site near Andrews, Texas.

From January 1, 2015, through October 26, 2015, the licensee made a total of 744 shipments to the various burial sites with a total volume of 288,971 cubic feet. Of the 744 shipments made, 645 shipments went to the US Ecology site in Idaho, 58 shipments were sent to the Energy Solutions site in Utah and 14 shipments were directed to the WCS site in Texas.

5.3 Conclusions

The licensee's program for transportation of solid waste material for off-site burial was found to be performed in accordance with license and regulatory requirements with one minor concern that was corrected during the period of the inspection.

6 Exit Meeting

The inspectors reviewed the scope and preliminary findings of the inspection during an exit meeting that was conducted at the conclusion of the onsite inspection on October 29, 2015, with a follow up telephonic exit on November 19, 2015. The follow up telephonic exit was to further discuss the five truck shipments that were consolidated to one rail shipment. The licensee did not identify as proprietary any information provided to, or reviewed, by the inspectors.

SUPPLEMENTAL INSPECTION INFORMATION

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INSPECTION PROCEDURES (IP) USED

IP 37801	Safety Reviews, Design Changes and Modifications at Permanently Shutdown Reactors
IP 40801	Self-Assessment, Auditing, and Corrective Action at Permanently Shutdown Reactors
IP 62801	Maintenance and Surveillance at Permanently Shutdown Reactors
IP 71801	Decommissioning Performance and Status Review at Permanently Shutdown Reactors
IP 86750	Solid Waste Management and Transportation of Radioactive Materials

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

None

Discussed

None

LIST OF ACRONYMS

ADAMS	Agencywide Documents Access and Management System
CAP	Corrective Action Program
CB&I	Chicago Bridge & Ironworks
CFR	<i>Code of Federal Regulation</i>
CSM	Cutter Soil Mixture
DOT	Department of Transportation
FSS	Final Site Survey
HBPP	Humboldt Bay Power Plant
IP	NRC Inspection Procedure
ISFSI	Independent Spent Fuel Storage Installation
LTP	License Termination Plan
NRC	U.S. Nuclear Regulatory Commission
QAP	Quality Assurance Plan
RWP	Radiation Work Permit
RCRA	Resource Conservation and Recovery Act
SFP	Spent Fuel Pool