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PG&E Letter HBL-17-004
PG&E Letter HIL-17-001

10 CFR 50.54
10 CFR 72.44

ATTN: Document Control Desk
Director, Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Docket No. 50-133, License No. DPR-7
Humboldt Bay Power Plant, Unit 3
Docket No. 72-27, Materials License No. SNM-2514
Humboldt Bay Independent Spent Fuel Storage Installation
Report of Changes to the Humboldt Bay Emergency Plan (Revision 8)

Dear Commissioners and Staff:

Pursuant to 10 CFR 50.4, 10 CFR 50.54(q), 10 CFR 72.4 and 10 CFR 72.44(f), enclosed is a report of changes to HBI-L4, Humboldt Bay Emergency Plan previously titled Humboldt Bay Site Emergency Plan, which became effective January 10, 2017. PG&E evaluated the changes did not decrease the effectiveness of the Emergency Plan (E-Plan), and the E-Plan continues to meet the requirements of 10 CFR 50.47(b), 10 CFR 50 Appendix E, and 10 CFR 72.32(a). The updated Humboldt Bay Emergency Plan has been distributed to NRC Region IV and is not included as part of this submittal.

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

Sincerely,

Loren D. Sharp

Enclosure

cc: Humboldt Distribution
cc/enc: William C. Allen, NRC
John B. Hickman, NRC
Kriss M. Kennedy, NRC Region IV Administrator

**REPORT OF CHANGES TO THE HUMBOLDT BAY EMERGENCY PLAN, REVISION 8
PURSUANT TO 10 CFR 50.54(q) and 10 CFR 72.44(f)
January 10, 2017**

Pursuant to the requirements of 10 CFR 50.54(q) and 10 CFR 72.44(f), the following changes to the HBI-L4, Humboldt Bay Emergency Plan (HB E-Plan) are submitted. The conditions onsite have changed due to current decommissioning activities. As a result, changes to the HB E-Plan were made to reflect current site conditions.

These changes included the following:

- updating references to outdated or cancelled procedures,
- removing reference to an emergency locker,
- updating site description (Site map and Building list),
- revised specific actions,
- added, "There are no postulated accidents in Unit 3 nor at the ISFSI that could result in the release of radioactive materials to the environment in quantities that could require the implementation of protective actions for the general public,"
- title change, and
- editorial and format changes.

Effectiveness screens were performed on the affected procedures and none of the changes were determined to be a reduction in effectiveness.

SECTION	DESCRIPTION
	Format
Title	Humboldt Bay (HB) independent spent fuel storage installation (ISFSI) procedures are being reconfigured with new headers. The content of this document was transferred to new header format, along with a new title number (HBI-L4).
1.0	Paragraph 3 Added "There are no postulated accidents in Unit 3 nor at the ISFSI that could result in the release of radioactive materials to the environment in quantities that could require the implementation of protective actions for the general public."

SECTION	DESCRIPTION
2.3.1	<p>Paragraph 2</p> <p>Previously read: “The reactor primary containment is located entirely below grade and is comprised of a drywell vessel housing the reactor and a suppression chamber located concentrically around the drywell. The drywell and suppression chamber are located within a reinforced concrete caisson that, in the vicinity of the reactor, is approximately 18 m (60 feet) in diameter with an inside depth of 24 m (78 feet) below grade. A caisson access shaft extends from the top of the caisson to the space beneath the drywell.”</p> <p>Now reads: “The drywell and suppression chamber are located within a reinforced concrete caisson that is located entirely below grade. The caisson is approximately 18 m (60 feet) in diameter with an inside depth of 24 m (78 feet) below grade. A caisson access shaft extends from the top of the caisson to the space beneath the drywell.”</p>
Figure 2.1-1	<p>Humboldt Bay Site Layout-Map Humboldt Bay Site Layout- Building List</p> <p>The site layout and building list were updated to reflect changes due to decommissioning.</p>
3.2.1	<p>Previously read: “As described in HB ISFSI FSAR Section 8.2, there are no credible accidents that would cause the leakage of fission products from the storage system. Nevertheless, an emergency locker containing portable radiation monitoring equipment, portable fire extinguishers and a first aid kit are maintained onsite.”</p> <p>Now reads: “As described in HB ISFSI FSAR Section 8.2, there are no credible accidents that would cause the leakage of fission products from the storage system. Nevertheless, portable radiation monitoring equipment, portable fire extinguishers and a first aid kit are maintained onsite.”</p>
Table 3.2-1	<p>HB ISFSI Emergency Action Levels Table 3.2-1: Emergency Coordinator Judgment.</p> <p>Previously read: “HU2”</p> <p>Now reads: “HU7”</p>

SECTION	DESCRIPTION
5.3.1.2	<p>Previously read: "Onsite Personnel Accountability/Assembly</p> <p>Accountability procedures for site personnel are intended to provide accountability for all personnel in the Restricted Areas and assembly for other site personnel. Site procedures describe the process of accountability/assembly of site personnel.</p> <p>If the site siren is sounded to indicate the accountability (assembly), each person is instructed to immediately go to a specific assembly area. A designated individual is assigned to each assembly area and is responsible to confirm personnel accountability, if required."</p> <p>Now reads: "Onsite Personnel Accountability/Assembly</p> <p>Procedures for site personnel are intended to provide for assembly of site personnel and describe the assembly process.</p> <p>If the site siren is sounded to indicate assembly, each person is instructed to immediately go to a specific assembly area. A designated individual is assigned to each assembly area and is responsible to confirm personnel accountability, if required."</p>
5.3.3.2	<p>Previously read: "Medical emergencies could consist of a serious injury, illness, or overexposure. Site and ISFSI personnel who receive first-aid training are authorized to take action to the extent justified. In all cases, individuals inform the Emergency Coordinator of the situation and render first aid to the patient in accordance with company-approved techniques. If the patient is inside the Unit 3 Restricted Area, the patient should be moved, as early as practical, to a designated area for decontamination (if possible or as necessary) and transported to the hospital, if required."</p> <p>Now reads: "Medical emergencies could consist of a serious injury, illness, or radiological overexposure. Site and ISFSI personnel who receive first-aid training are authorized to take action to the extent justified. In all cases, individuals inform the Emergency Coordinator of the situation and render first aid to the patient in accordance with company-approved techniques. If the medical emergency involves radioactive contamination, the patient should be moved, as early as practical, to a designated area for decontamination (if possible or as necessary) and transported to the hospital, if required."</p>

SECTION	DESCRIPTION
8.1.2.a	<p>Previously read: "In accordance with 10 CFR 50.54(q) and 10 CFR 72.44(f), PG&E may make changes to the Site Humboldt Bay Emergency Plan without NRC approval only if the changes do not decrease the effectiveness of the Plan, and the Plan, as changed, continues to meet the applicable standards 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR 50 and 10 CFR 72.32. At HBPP, the specific requirements for making and evaluating changes to the Plan to determine if those changes decrease the effectiveness of the Plan are set forth in procedures HBAP C-19, "Licensing Bases Impact Evaluation (LBIE)" and EPIP R-10, "Emergency Plan Management," specifically the section on 10CFR50.54(q) Screening and Effectiveness Evaluations. If a change is made without approval, PG&E shall submit, as specified in 50.54(q), a report of each change within thirty days after the change is made (effective date of revision). After termination of the 10 CFR Part 50 license, the remaining emergency preparedness provisions for the ISFSI are subject only to the requirements of 10 CFR Part 72. PG&E shall retain a record of each change made to the Emergency Plan without prior NRC approval for a period of three years."</p> <p>Now reads: "In accordance with 10 CFR 50.54(q) and 10 CFR 72.44(f), PG&E may make changes to the Humboldt Bay Emergency Plan without NRC approval only if the changes do not decrease the effectiveness of the Plan, and the Plan, as changed, continues to meet the applicable standards 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR 50 and 10 CFR 72.32. At Humboldt Bay, the specific requirements for making and evaluating changes to the Plan to determine if those changes decrease the effectiveness of the Plan are set forth in procedures HBI-109, "ISFSI Licensing Bases Impact Evaluation (LBIE)" and HBI-260, "Site Emergency Plan Administration," specifically the section on 10CFR50.54(q) Screening and Effectiveness Evaluations. If a change is made without approval, PG&E shall submit, as specified in 50.54(q), a report of each change within thirty days after the change is made (effective date of revision). After termination of the 10 CFR Part 50 license, the remaining emergency preparedness provisions for the ISFSI are subject only to the requirements of 10 CFR Part 72. PG&E shall retain a record of each change made to the Emergency Plan without prior NRC approval for a period of three years."</p>