



**Pacific Gas and
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November 8, 2017

PG&E Letter HIL-17-005

10 CFR 72.70

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

Materials License No. SNM-2514, Docket No. 72-27
Humboldt Bay Independent Spent Fuel Storage Installation
Final Safety Analysis Report Update, Revision 6

Dear Commissioners and Staff:

Pursuant to 10 CFR 72.70(c), and in accordance with 10 CFR 72.4, Pacific Gas and Electric Company (PG&E) hereby submits the Humboldt Bay (HB) Independent Spent Fuel Storage Installation (ISFSI) Final Safety Analysis Report (FSAR) Update, Revision 6. This revision includes changes to the FSAR Update since the last submittal through October 1, 2017, in accordance with 10 CFR 72.70 (c)(5). These changes were made under the provisions of 10 CFR 72.48. Enclosure 1 includes changes to the FSAR requiring 10 CFR 72.48 evaluations. There were no FSAR changes incorporated into this revision as a result of a license amendment.

PG&E identified instances within the FSAR where descriptions have not been updated to address physical changes, such as removal of structures and tanks, as a result of Humboldt Bay Power Plant Decommissioning activities. This is documented in the corrective action program and is scheduled to be updated in the next FSAR submittal. The accident analyses in the FSAR have already been updated to reflect the current site configuration.

The HB ISFSI FSAR Update, Revision 6, is included in Enclosure 2, and is provided on one compact disk (CD-ROM) labeled "Humboldt Bay Independent Spent Fuel Storage Installation Final Safety Analysis Report Update, Revision 6, November 2017." The contents are in Adobe Acrobat Portable Document Format (pdf).

NM5520
NM5526
NM55



The CD-ROM contains the following publically-available files for HB ISFSI FSAR Update, Revision 6:

<u>Filename</u>	<u>File Size</u>
001 HB ISFSI FSAR R6 Except 2.6 Figs.pdf	22.1 MB
002 HB ISFSI FSAR R6 Figs 2.6-1 to 2.6-20.pdf	39.7 MB
003 HB ISFSI FSAR R6 Figs 2.6-21 to 2.6-44.pdf	30.0 MB
004 HB ISFSI FSAR R6 Figs 2.6-45 to 2.6-46.pdf	45.8 MB
005 HB ISFSI FSAR R6 Figs 2.6-47 to 2.6-85.pdf	46.9 MB
006 HB ISFSI FSAR R6 Figs 2.6-86 to 2.6-120.pdf	44.2 MB

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

If you have any questions regarding this submittal, please contact Mr. Hossein Hamzehee at 805-545-4720.

This certifies, to the best of my judgement and belief, that Revision 6 accurately presents changes made since the previous submittal.

Sincerely,

James M. Welsch
Vice President Nuclear Generation and Chief Nuclear Officer

Enclosures

cc: Scott A. Morris, NRC Region IV Administrator (Acting)
HBPP Humboldt Distribution
cc/enc: William C. Allen, NRC Project Manager

**Changes Incorporated into the Humboldt Bay Independent Spent Fuel Storage
Installation Final Safety Analysis Report Update, Revision 6
Requiring 10 CFR 72.48 Evaluations**

Licensing Bases Impact Evaluation (LBIE) 2017-001

Description of Change

The Humboldt Bay (HB) Independent Spent Fuel Storage Installation (ISFSI) Final Safety Analysis Report (FSAR) Update, Sections 2.2 and 8.2 were updated in conjunction with a pre-application inspection that was performed in 2017 for preparation of the HB ISFSI License Renewal Application. The pre-application inspection performed an inspection of one cell of the ISFSI vault and the HI-STAR HB stored within this cell. This pre-application inspection required removal of the vault cell lid to perform the inspection. The vault cell lid is an important-to-safety component.

Summary of Evaluation

Statements, headers, and identifiers in FSAR Sections 2.2 and 8.2 have been added to clarify what hazards are (1) existing, (2) historical and no longer apply, and (3) are historical, but have analyses that still remain valid and are bounding.

While the transport and long-term storage modes discussed in the existing FSAR are still applicable, Table 2.2-1 has been revised to clarify the administrative controls required for specific modes that may be experienced, including:

- maintenance/inspection activities that involve removal and reinstallation of a cask from the storage vault;
- maintenance and inspections in preparation for transfer of spent fuel and greater than Class C waste casks to an authorized offsite storage facility;
- a vault lid removal for maintenance/inspections; and
- long-term storage in the storage vault.

The results of the 10 CFR 72.48 Evaluation show that the changes do not require prior NRC approval.

Humboldt Bay ISFSI FSAR Update, Revision 6, CD-ROM

November 2017