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PG&E Letter HBL-19-013

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

10 CFR 50.82 (a)(9)

Docket No. 50-133, OL-DPR-7  
Humboldt Bay Power Plant, Unit 3  
Reclassification of Building 13 (Count Room Building)

Dear Commissioners and Staff:

In accordance with Humboldt Bay Power Plant Unit 3 (HBPP) License Condition 2.C.(5), Pacific Gas and Electric Company (PG&E) is notifying the NRC at least 14 days prior to implementation of reclassification of a survey area to a less restrictive classification. PG&E intends to reclassify Building 13 (Count Room Building or Count Room) as depicted in Figure 2-2 of the Defueled Safety Analysis Report and described in Section 2.1.8.16 of the License Termination Plan (LTP) from a Class 1 to lower classifications per discussion below.

The Count Room was built during decommissioning and placed in service in 2010. The building was classified as a Class 1 area based on the expected decommissioning support activities to be conducted in the area. The current classification of the structure as indicated by LTP Section 2.1.8.16 is a Class 1 survey area.

PG&E proposes to perform a survey to the rigors of a Class 2 survey area on accessible surfaces of the floors where samples were stored or processed. These areas include the Alpha, Beta, Gamma, and Environmental Lab rooms. The two fume hoods located in the Alpha Lab and Environmental Lab where samples were processed will be removed, characterized, and dispositioned as appropriate. It should be noted that the exhausts for each fume hood are independent of, and not connected to, the building ventilation system.

A review of weekly surveys conducted since the building was placed into service indicated no removable activity identified above method detection levels from smear data analyzed using proportional Alpha/Beta count systems. There was an incident noted on October 13, 2014, in the Gamma Lab when a small sample of paint chips was spilled, creating a lead hazard. Pre-cleanup removable contamination results from the spill area indicated no activity levels exceeding field instrument detection levels, indicating that the spill did not create a contamination hazard for personnel.



The area was remediated and down-posted the same day after lead and radiological contamination surveys indicated there was no residual contaminants present.

The reclassification of the Alpha, Beta, Gamma, and Environmental Lab rooms of the Count Room from a Class 1 to a Class 2 survey unit is reasonable and appropriate given the above history and a review of routine weekly contamination surveys performed of the areas showing an absence of activity distinguishable from background.

PG&E proposes to perform a survey to the rigors of a Class 3 survey area on metal structures such as interior and exterior siding, side support beams, sheet metal roof, and ceiling areas in the structure. The reclassification of the exterior surfaces of the building structure is reasonable and appropriate given that the structure was built in the 2009-2010 timeframe, long after Unit 3 was shut down, and the Final Status Survey data collected from the Class 2 and Class 3 survey areas surrounding the structure. The reclassification of the interior surfaces of the building structure are reasonable and appropriate given the historical contamination surveys of the facility and the preliminary results of the Oak Ridge Institute for Science and Education survey performed during the last NRC inspection conducted the week of August 26, 2019.

The above changes to classification for final status survey of the Count Room standing structure and Count Room Labs will be reflected in the biennial update to the LTP.

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

If you have any questions, please contact William Barley, Site Closure Manager, at (707) 444-0856.

Sincerely,

A handwritten signature in black ink, appearing to read 'James M. Welsch'.

James M. Welsch

*Senior Vice President Generation, and Chief Nuclear Officer*

cc: John B. Hickman, NRC Project Manager  
Scott A. Morris, NRC Region IV Administrator  
HBPP Humboldt Distribution