



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION V

1450 MARIA LANE, SUITE 210  
WALNUT CREEK, CALIFORNIA 94596

SEP 24 1984

Docket No. 50-133

MEMORANDUM FOR: File

FROM: Conrad Sherman  
Radiation Specialist

SUBJECT: HUMBOLDT BAY POWER PLANT UNIT NO. 3  
Decommissioning Plan

A meeting was held on September 11, 1984 between NRC representatives and the licensee to discuss subject and the NRC's schedule for preparation of an Environmental Impact Statement. In addition, questions posed at the ACRS meeting held on September 10, 1984 were discussed.

Participants were as follows:

NRC

C. Sherman, RV  
F. Wenslawski, RV  
F. Witt, NRR/CHEB  
P. Erickson, NRR/ORB

PGE

R. Parker, HBPP  
R. Nelson, HBPP  
E. Weeks, HBPP  
J. Raggio, GO  
G. Wu, GO

The following subjects were discussed:

1. ACRS comment on requirements to keep releases ALARA.

It was agreed in discussion that no additional requirements existed beyond those of Part 20 in the area of effluent releases. The NRC indicated that it would be desirable for releases to be kept below the 10 CFR 20 requirements and that the compliance with 40 CFR 190 as mandated by 10 CFR 20 would also be required. The licensee indicated that releases were already ALARA and would be lower during the safestor period.

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2. Sources of radwaste during safestor.

When the safestor period is ended the likely sources of water will be leakage into the spent fuel pool liner space, rain water collected through the yard drainage systems and approximately 20 or 30 gallons per day from the cession sump.

3. ACRS comment on cannabilization of the plant.

Licensee stated that the parts in Unit 3 were not compatible with the fossil units and that the licensee has administrative controls in this area.

4. ACRS comment on spent fuel pool monitor.

NRC RV expressed the position that a spent fuel monitor was not necessary but that the licensee's plans for monitoring spent fuel pool should insure that representative samples would be taken for water in the vicinity of the spent fuel. Licensee stated the position that fuel damage was highly unlikely that any additional effort to improve monitoring of the spent fuel was not warranted and that the monitoring the activities above the pool for Krypton 85 would perhaps be a better indicator of fuel damage.

5. The ACRS raised several questions regarding failure of fuel while stored in the spent pool.

Licensee indicated that the fuel failure was unlikely and would at best be a slow process and the radiological consequences of such failure would be negligible.

6. ACRS question on need for filters (HEPA) on fuel pool exhaust.

Licensee representatives and NRC RV representatives were in agreement that HEPA filters would likely not be needed on the exhaust system as the primary effluent would be Krypton 85. Regarding additional ACRS concern on particulate activity being released during the decommissioning operations, the licensee noted that systems would be laid up dry and sealed before the safestor period has ended and it would be unlikely that any actions to cause release of activity could occur during the safestor phase.

7. Timing for issuance of the Environmental Impact Statement.

P. Ericson described the timing for issuance of an environmental impact statement indicated that it would be required by 10 CFR 51. It was noted that approximately a minimum of one year would be required for issuance of the environmental impact statement and that the final technical specification revisions for the safestor could not be issued before that.

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8. Adequacy of and need for additional biota monitoring.

This question was discussed and no resolution was reached. It is likely that this requirement would need to be defined in a technical specifications. The licensee stated the position that biota monitoring in the past had been negative and with the lower volume of releases in the future, it is expected that additional monitoring would not be necessary.

9. Soil contamination on the site.

Several anomalies associated with soil sample data described in the decommissioning report were discussed. No resolution was reached at the ACRS meeting or the subsequent meeting.

10. Provisions for groundwater monitoring to address fuel pool leakage concerns.

No comments.

11. Requirements for unloading pellets from new fuel pins onsite.

The licensee indicated that they had entered negotiations with Exxon Corporation for removal of the unirradiated fuel bundles. Proposed plans discussed include decontaminating the fuel onsite and shipping it offsite to the fuel fabricator. The second possibility discussed was a two phase operation in which analysis of several fuel pins would be performed by opening the pins onsite and samples taken, with the second stage being unloading all water fuel pins into containers and having these containers brought to the fuel fabricator. This program will be initiated because the fuel fabricator would be unable to handle contaminated fuel pins at his facility. NRC representatives indicated that: (a) fuel fabricator most likely did not have license authority to perform these operations at Humboldt Bay Site and that Humboldt Bay should consider the license considerations regarding disassembly of fuel pins at their facility including a 50.59 review. It was agreed that this matter would need to be discussed further within NRC before any position could be stated.

The meeting concluded with a brief tour of the Unit 3 facility by the NRC Region V participants.

*C. Sherman for*

C. Sherman  
Radiation Specialist

cc: P. Erickson, NRR, DL