

February 11, 2000

Mr. Steve J. Redeker, Manager  
Plant Closure & Decommissioning  
Sacramento Municipal Utility District  
14440 Twin Cities Road  
Herald, CA 95638-9799

SUBJECT: UPDATE OF SAFETY EVALUATION FOR SACRAMENTO MUNICIPAL  
UTILITY DISTRICT REVISED RANCHO SECO EMERGENCY PLAN TO  
INCORPORATE EMERGENCY PLANNING REQUIREMENTS FOR THE LONG-  
TERM DEFUELED CONDITION AND INDEPENDENT SPENT FUEL STORAGE  
INSTALLATION (TAC NO. MA5701)

Dear Mr. Redeker:

By letter dated April 29, 1996, Sacramento Municipal Utility District submitted change 4 to the Rancho Seco Emergency Plan (RSEP). Following a site visit by the staff on February 17-18, 1999, and a request for additional information dated May 18, 1999, the submittal was substantially revised and resubmitted on May 27, 1999. On October 27, 1999, the NRC issued a safety evaluation which approved the revised plan. Subsequent to the issuance of the safety evaluation, the NRC has been informed of a minor discrepancy in Section 3.2.1.6, (Emergency Communications) of the safety evaluation. We have enclosed a revised safety evaluation in which Section 3.2.1.6 has been modified to more clearly describe the communications capabilities provided for in the plan. The area of change is marked by a vertical line in the right margin. Our previous conclusions regarding the overall acceptability of the plan remain unchanged by these minor revisions.

Should you have any questions please contact me at 301-415-1116.

Sincerely,

*/RA/*  
Richard F. Dudley, Senior Project Manager  
Decommissioning Section  
Project Directorate IV & Decommissioning  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-312, 72-11

Enclosure: Revised Safety Evaluation

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO A REVISED EMERGENCY PLAN TO INCORPORATE  
EMERGENCY PLANNING REQUIREMENTS FOR THE LONG-TERM DEFUELED  
CONDITION AND INDEPENDENT SPENT FUEL STORAGE INSTALLATION  
FOR FACILITY OPERATING LICENSE (POSSESSION ONLY) NO. DPR-54  
SACRAMENTO MUNICIPAL UTILITY DISTRICT  
RANCHO SECO NUCLEAR GENERATING STATION  
DOCKET NO. 50-312

1.0 INTRODUCTION

By letter dated April 29, 1996, the Sacramento Municipal Utility District (SMUD, the licensee) submitted a revision to change 4 of the Rancho Seco Emergency Plan (RSEP) and associated emergency plan implementing procedures (EPIPs) for NRC review and approval. This revision was submitted in accordance with 10 CFR 72.32(a) as part of the licensee's application for an independent spent fuel storage installation (ISFSI) and also in accordance with 10 CFR 50.54(q). The revised RSEP combines in a single emergency plan the description of the licensee's program to cope with emergency situations that could result from both 10 CFR Part 50 and 10 CFR Part 72 licensed activities. The revised RSEP was substantially changed and resubmitted on May 27, 1999, following a site visit on February 17-18, 1999, and a request for additional information sent to the licensee on May 18, 1999. The revised RSEP includes changes to the 10 CFR Part 50 non-exempted emergency planning requirements and incorporates 10 CFR Part 72 emergency planning requirements for the ISFSI and related activities; i.e., spent fuel removal from the spent fuel building, spent fuel cask transport to the ISFSI, and spent fuel canister storage at the ISFSI. The Office of Nuclear Reactor Regulation's review of the revised RSEP is described below.

2.0 BACKGROUND

The Rancho Seco nuclear power plant was shut down in June 1989 and all the spent fuel is currently stored in the spent fuel pool in the spent fuel building. The NRC issued an exemption in February 1991 that eliminated offsite emergency planning and allowed a reduction in the scope of onsite planning. The Rancho Seco emergency plan for the long-term defueled condition of the plant was approved in February 1991 and has been revised several times by SMUD under the provisions of 50.54(q) which permits licensees to make changes to their emergency plans without Commission approval if the changes do not decrease the effectiveness of the plans and the plans, as changed, continue to meet the applicable standards of 50.47(b) and requirements of Appendix E to Part 50. Proposed changes that

decrease the effectiveness of the approved emergency plan may not be implemented without application to and approval by the Commission.

### 3.0 EVALUATION

#### 3.1 Scope of Review

The staff reviewed the revised emergency plan for coping with radiological emergencies at the Rancho Seco site including the licensee's 10 CFR 50.54(q) evaluation to verify that the changes made do not decrease the effectiveness of the plan and the plan, as changed, continues to meet the standards contained in 50.47(b) and the requirements of Appendix E to 10 CFR Part 50 applicable to the approved Part 50 emergency plan for the long-term defueled condition.

In addition the staff reviewed the revised RSEP to ensure that the revised plan complies with 10 CFR Part 72 emergency planning requirements. Detailed requirements for emergency planning at an ISFSI not located on the site of an operating nuclear power reactor are specified in 10 CFR 72.32(a) and include provisions for detecting, assessing, classifying, and mitigating events; assigning emergency responsibilities; communicating with offsite organizations and the public; and conducting exercises.

The review of the portions of the revised RSEP relevant to the ISFSI operation was performed in accordance with guidance contained in draft NUREG-1567, "Standard Review Plan for Spent Fuel Dry Storage Facilities," and Regulatory Guide 3.67, "Standard Format and Content for Emergency Plans for Fuel Cycle and Material Facilities."

#### 3.2 Evaluation

##### 3.2.1 Changes Made to the 10 CFR Part 50 Emergency Planning Requirements

The licensee made various changes to its 10 CFR Part 50 non-exempted emergency planning requirements to reflect the long-term defueled condition of the plant. In the current long-term defueled condition at Rancho Seco, both the spectrum of postulated accidents and the associated potential radiological exposures are substantially reduced. The occurrence of accidents with offsite consequences exceeding Environmental Protection Agency (EPA) Protective Action Guidelines (PAGs) is not considered credible. Along with the revised RSEP, the licensee transmitted to the NRC its 50.54(q) evaluation that the changes do not decrease the effectiveness of the plan for the current long-term defueled condition of the plant.

The staff reviewed the revised RSEP and the licensee's 50.54(q) evaluation in order to verify that the emergency planning areas applicable to the long-term defueled condition of Rancho Seco were adequately addressed in the plan. The review pertaining to each of these areas is addressed in the following sections.

##### 3.2.1.1 Assignment of Responsibility (Organization Control)

Section 5 of the plan describes the onsite organization in the event of an emergency as well as the responsibilities of personnel filling key emergency positions. Section 4 of the plan identifies

local and governmental organizations that would respond in case of an emergency. Section 5.3 of the plan presents SMUD's minimum shift staffing and the capability for addition.

#### 3.2.1.2 Onsite Emergency Organization

Section 5.3 of the plan describes the emergency response organization covering the Technical Support Center (TSC) and the control room. The plan provides a chart of the response organization listing the individuals for each emergency response position. The plan identifies by title (Emergency Coordinator, EC) the individual who is in charge of the emergency response. The minimum on-shift organization is composed of a Shift Supervisor (who assumes the role of the Emergency Coordinator at the onset of an accident) and an operator. A Chem/Rad Decommissioning Technician is required to be present during fuel and/or cask handling operations and when performing any evolution that has the potential to involve a significant change in radiological conditions. Section 5.3 of the plan specifies additional capabilities available to respond in an emergency.

#### 3.2.1.3 Emergency Response Support and Resources

Section 4 of the plan describes the arrangements made with local support agencies for medical, fire, and law enforcement assistance. A list of the corresponding letters of agreement is found in Attachment 4-1 of the plan. SMUD was exempted, on February 22, 1991, from the requirement to maintain a near-site Emergency Operations Facility (EOF).

#### 3.2.1.4 Emergency Classification System

Section 3 of the plan contains an overview of the emergency classification and emergency action level (EAL) scheme, including initiating conditions associated with possible events at Rancho Seco that would result in the declaration of a Notification of Unusual Event or an Alert. Specific instruments, parameters, and equipment conditions are detailed in plant procedure EPIP-5001, "Recognition and Classification of Emergencies." SMUD has reached agreement with appropriate State and local governmental authorities on the EALs. The staff has reviewed the EALs and determined that they are acceptable considering the long-term defueled condition of the facility.

#### 3.2.1.5 Notification Methods and Procedures

The licensee's operating staff would be notified of any abnormal operating conditions or of any threat to safe operation by actuation of the plant siren and public address announcements issued in the control room and broadcast to the entire facility (Section 6.3.1 of the plan). Public address announcements are described in EPIP-5002, "Emergency Actions."

Section 7.2 of the plan indicates that the control room contains communications equipment used for making notifications to offsite authorities (State of California, Sacramento County, NRC). Local support services would also be available to provide assistance in the event of an emergency at Rancho Seco. Section 4.2 of the plan describes the agreements in place with respect to medical support, fire support, and law enforcement support. The plan indicates that medical support will be requested from offsite support agencies as specified in procedure OP-C.53, "Medical Emergency," if deemed necessary.

Section 6 of the plan includes a commitment to notify the NRC response center immediately after notification of local jurisdictions (Sacramento County and State of California), and no later than 60 minutes after declaration of the emergency.

Section 6.2 of the plan indicates that initial, follow-up, and closeout notifications will be transmitted to offsite authorities informing them of the status of the event, radiological releases, and actions being taken. Procedure EPIP-5010, "Notification/Communication," describes in detail the type of information to be communicated to offsite response organizations, including State and county, and the NRC, in the event of an emergency at Rancho Seco. The information includes, in part, the caller's name and title, a brief description of the event including the date and time of emergency declaration, and radiological release information.

#### 3.2.1.6 Emergency Communications

Section 7.2 of the plan indicates that the control room contains communications equipment used for making emergency notifications to the State of California, Sacramento County, NRC, and SMUD personnel. EPIP-5010, "Notification/Communication," lists the emergency communications equipment in the control room and the TSC.

#### 3.2.1.7 Public Education and Information

The RSEP does not include provisions for the dissemination of emergency planning information materials to the public. On November 30, 1990, an exemption was granted to Rancho Seco regarding dissemination of public information materials. The RSEP does include arrangements for the SMUD public information personnel to provide information to the public in the event of an emergency.

#### 3.2.1.8 Emergency Facilities and Equipment

SMUD maintains two emergency facilities, the control room and the TSC. SMUD was exempted, on February 22, 1991, from the requirement to maintain a near-site EOF and an offsite Emergency News Center.

Section 7.1 of the plan describes emergency facilities and equipment. The plan states that the TSC contains, in part, emergency lockers with radiation monitoring instruments, radiation control materials, forms, and clerical supplies. In addition the plan indicates that the control room and the TSC are designed with adequate shielding to ensure radiation levels will be maintained at low levels during accident conditions and that the control room has a radiation detector with appropriate alarms.

#### 3.2.1.9 Accident Assessment

The revised Rancho Seco emergency plan calls for onsite systems and equipment to allow for radiological accident monitoring and assessment of radiological conditions. Section 3.3 of the emergency plan specifically refers to area radiation monitors (ARMs) and portable radiation monitors. Section 6.2 indicates that dose calculations will be based on indications from the spent fuel building ARM and the auxiliary building stack ARM for monitored release, or a default dose estimate based upon accident analysis calculations for unmonitored releases. Section 7.2 of the plan indicates that the TSC contains emergency lockers with radiation monitoring

instruments. Section 6.2 of the plan directs on-shift personnel to conduct radiological monitoring during the initial phase of an emergency, as warranted. EPIP-5430, "Onsite Dose Calculations," describes the method of estimating the dose due to releases of fission product gasses from the spent fuel building.

#### 3.2.1.10 Protective Response

Section 6 of the revised Rancho Seco emergency plan describes the protective actions that would be taken onsite in the event of a radiological situation to protect plant personnel. These actions encompass notification of an emergency, dismissal (process of directing non-emergency response personnel to leave the site when their safety is of concern), accountability, and decontamination. It is not expected that any protective actions for the public will be required under the plan since there is such a low risk of an accident with offsite consequences for Rancho Seco in its defueled state. The Emergency Planning Zone (EPZ) for Rancho Seco is the Industrial Area, an area of approximately 87 acres that is enclosed by security fences and contains the plant structures including the ISFSI.

#### 3.2.1.11 Radiological Exposure Control

Section 6.3.2 of the plan describes the means for controlling radiological exposures in an emergency. These means are consistent with EPA Emergency Worker and Lifesaving Activity PAGs. In addition, as specified in Section 5.4 of the plan, the EC is responsible for authorizing emergency workers to receive doses in excess of 10 CFR Part 20 limits. The EC will conform to the guidance set forth in EPIP-5200 and EPIP-5360 to authorize worker overexposure.

#### 3.2.1.12 Medical and First Aid Support

Arrangements have been made for hospital and medical services as indicated in Section 4, "Support Services," of the revised Rancho Seco emergency plan. An agreement exists between SMUD and the U.C. Davis Medical Center to treat contaminated injured personnel. Services include transport, emergency room, decontamination, medical care, and follow-up.

#### 3.2.1.13 Recovery and Reentry Planning

Section 5.5 addresses reentry and recovery in general terms. It indicates that the EC is responsible for closeout of emergencies and for determining if a recovery organization should be established and ensuring that members of a recovery organization are appropriately qualified. The plan states that recovery and reentry operations will be conducted in accordance with the EIPs. EPIP-5210 addresses reentry and recovery operations.

#### 3.2.1.14 Exercises and Drills

Section 8 of the revised emergency plan contains the provisions for periodic drills and exercises. It provides, on an annual basis, for a medical drill, a fire drill, and an exercise affecting the entire site. Offsite organizations are invited to participate in or observe the drills and exercises.

EPIP-5600 provides guidelines to prepare, conduct, and evaluate drills and exercises. The revised plan indicates that the Radiation Protection/Chemistry Group is responsible for



developing, planning, scheduling, and conducting drills and exercises. The revised plan states that deficiencies identified must be evaluated and corrected.

#### 3.2.1.15 Radiological Emergency Response Training

SMUD maintains a training program to ensure that personnel assigned to the emergency response organizations are trained prior to assuming any emergency plan responsibilities and are retrained annually. This program is described in Section 8.2 of the plan. Procedure EPIP-5600, "Emergency Response Training," covers basic as well as specialized training for those emergency response personnel with specific assignments. Training for participating offsite agency personnel involved in emergency response is made available. Procedure EPIP-5600 indicates that emergency preparedness personnel provide orientation tours and/or radiological emergency response training to fire department, sheriff's department, medical and ambulance personnel, and State and County Office of Emergency Services personnel.

#### 3.2.1.16 Plan Development and Review

Section 8.4 of the plan indicates that the plan and EIPs shall be reviewed by Chemistry/RP Group personnel every 2 years and shall be updated as necessary.

The licensee has obtained comments from offsite response organizations (Sacramento County and State of California) on its revised emergency plan. These comments have been provided to the NRC. Section 8.4 of the revised plan indicates that changes to the plan or EALs will be reviewed with the State of California and the Sacramento County.

Section 8.7 of the plan indicates that an independent audit of the Emergency Planning Program will be conducted at least once per year in accordance with the Rancho Seco Quality Manual.

### 3.2.2 Incorporation of 10 CFR Part 72 Emergency Planning Requirements

Paragraph (a) of 10 CFR 72.32 lists the information that an emergency plan for an ISFSI not located on the site of a nuclear power reactor is to contain. Specifically, 10 CFR 72.32(a) identifies 16 emergency planning areas that the plan shall cover. The staff reviewed the revised RSEP in order to verify that these emergency planning areas are adequately addressed in the plan. The review pertaining to each of these areas is summarized in the following sections.

#### 3.2.2.1 Facility Description

The revised RSEP provides a description of the facility and the area near the site including transportation routes, recreation area, and population distribution. The plan also includes maps of different scales showing the Rancho Seco near site area and the EPZ. The EPZ for Rancho Seco is the Industrial Area, an area of approximately 87 acres that is enclosed by security fences and contains the plant structures including the ISFSI.

#### 3.2.2.2 Types of Accidents

The revised RSEP identifies and describes a comprehensive set of postulated accidents for which actions may be needed to prevent or minimize exposure from radiation and/or radioactive

materials to onsite personnel. With respect to the ISFSI, the analyses of these conditions are contained in the Rancho Seco ISFSI Safety Analysis Report and are summarized in the revised RSEP (Section 3.4.5). Postulated accidents associated with the ISFSI include accidental cask drop, dry storage canister (DSC) leakage, accident pressurization of a DSC, earthquake, tornado winds and tornado generated missiles, flood, lightning effects, complete blockage of horizontal storage module (HSM) air inlet and outlet vents, reduced HSM air inlet and outlet shielding, and snow and ice loads. The analyses show that none of these accidents would result in potential radiological exposures to the public outside the site boundary exceeding the EPA PAGs. Acceptability of the licensee's accident analyses is being reviewed as part as the evaluation of the ISFSI Safety Analysis Report.

### 3.2.2.3 Classifications of Accidents

Section 3 of the revised Rancho Seco emergency plan contains an emergency classification and EAL scheme, including initiating conditions associated with possible events at Rancho Seco that would result in the declaration of a Notification of Unusual Event or an Alert. Specific instruments, parameters, and equipment conditions are detailed in plant procedure EPIP-5001, "Recognition and Classification of Emergencies." The staff has reviewed the EALs and determined that they are acceptable.

### 3.2.2.4 Detection of Accidents

The revised RSEP addresses in Section 3.3 how abnormal conditions or accidents would be detected at the site. Section 3.3 indicates for each type of accidents the means that would be used (i.e., visual observation, level annunciators, temperature indications, area radiation monitors, smoke detectors).

### 3.2.2.5 Mitigation of Consequences

The revised RSEP indicates that the Emergency Coordinator is responsible for directing response activities and mitigation of consequences of the emergency situation. The Shift Supervisor assumes the position of EC at the onset of an accident. The TSC Director replaces the Shift Supervisor as EC if the TSC is activated. The Shift Supervisor directs the activities of on-shift operators. With respect to mitigation of consequences, operators are responsible for (1) mitigating actions to place the plant/spent fuel in a safe condition, and protect plant personnel and the public; and (2) perform first aid, fire fighting, search and rescue, damage control, onsite dose assessment, and radiological monitoring. The revised plan states that initial mitigating response to most events will be in accordance with Annunciator and Operations Casualty Procedures.

Section 6 of the revised Rancho Seco emergency plan describes the protective actions that would be taken onsite in the event of a radiological situation to protect plant personnel. These actions encompass notification of an emergency, dismissal (process of directing non-emergency response personnel to leave the site when their safety is of concern), accountability, and decontamination.

Arrangements have been made for hospital and medical services as indicated in Section 4, "Support Services," of the revised Rancho Seco emergency plan. An agreement exists

between SMUD and the U.C. Davis Medical Center to treat contaminated injured personnel. Services include transport, emergency room, decontamination, medical care, and follow-up.

#### 3.2.2.6 Assessment of Releases

The revised Rancho Seco emergency plan calls for onsite systems and equipment to allow for radiological accident monitoring and assessment of radiological conditions. Section 3.3 of the emergency plan specifically refers to ARMs and portable radiation monitors. Section 7.2 of the plan indicates that the TSC contains emergency lockers with radiation monitoring instruments. Section 6.2 of the plan directs on-shift personnel to conduct radiological monitoring during the initial phase of an emergency, as warranted.

#### 3.2.2.7 Assignment of Responsibilities

Section 5, "Organizational Control of Emergencies," of the revised RSEP describes the on-shift and augmented emergency organization to be activated onsite for possible events and responsibilities of key personnel. The plan identifies by title (Emergency Coordinator) the individual who is in charge of the emergency response. The minimum on-shift organization is composed of a Shift Supervisor (who assumes the role of the Emergency Coordinator at the onset of an accident) and an operator. A Chem/Rad Decommissioning Technician is required to be present during fuel and/or cask handling operations and when performing any evolution that has the potential to involve a significant change in radiological conditions. EPIP-5010, "Notification/Communication," identifies a communicator with the responsibility for promptly notifying offsite response organizations and the NRC.

The Emergency Response Organization (ERO) consists of two separate organizations, one for the control room and one for the TSC. Activation of the ERO is initiated by the Shift Supervisor who directs Security to conduct a callout of the TSC emergency organization (in accordance with EPIP-5002 and EPIP-5220). SMUD maintains the capability to provide corporate support upon the request of the Emergency Coordinator. Section 4, "Support Services," contains the description of the emergency organization to be activated offsite and their responsibilities. In addition, the revised RSEP identifies the Radiation Protection/Chemistry organization as the one responsible for maintaining and updating the emergency preparedness program.

#### 3.2.2.8 Notification and Coordination

Section 3 of the plan contains an overview of the emergency classification and EAL scheme, including initiating conditions associated with possible events at Rancho Seco that would result in the declaration of a Notification of Unusual Event or an Alert. Specific instruments, parameters, and equipment conditions are detailed in plant procedure EPIP-5001, "Recognition and Classification of Emergencies." SMUD has reached agreement with appropriate State and local governmental authorities on the EALs. The staff has reviewed the EALs and determined that they are acceptable when compared to the applicable guidance considering the long-term defueled condition of the facility.

The licensee's operating staff would be notified of any abnormal operating conditions or of any danger to safe operations by actuation of the plant siren and public address announcements issued in the control room and broadcasted in the entire facility (Section 6.3.1 of the plan). Public address announcements are described in EPIP-5002, "Emergency Actions."

Section 7.2 of the plan indicates that the control room contains communications equipment used for making notifications to offsite authorities (State of California, Sacramento County, NRC). Local support services would also be available to provide assistance in the event of an emergency at Rancho Seco. Section 4.2 of the plan describes the agreements in place with respect to medical support, fire support, and law enforcement support. The plan indicates that medical support will be requested from offsite support agencies as specified in procedure OP-C.53, "Medical Emergency," if deemed necessary. Section 7.2 also stipulates that the TSC is the coordination point for the assembly and dispatch of response teams.

Section 6 of the plan includes a commitment to notify the NRC response center immediately after notification of local jurisdictions (Sacramento County and State of California), and no later than 60 minutes after declaration of the emergency.

#### 3.2.2.9 Information to be Communicated

Section 6.2 of the plan indicates that initial, follow-up, and closeout notifications will be transmitted to offsite authorities informing them of the status of the event, radiological releases, and actions being taken. Procedure EPIP-5010, "Notification/Communication," describes in detail the type of information to be communicated to offsite response organizations, including State and county, and the NRC, in the event of an emergency at Rancho Seco. The information includes, in part, the caller's name and title, a brief description of the event including the date and time of emergency declaration, and radiological release information.

#### 3.2.2.10 Training

SMUD maintains a training program to ensure that personnel assigned to the emergency response organizations are trained prior to assuming any emergency plan responsibilities and retrained annually. This program is described in Section 8.2 of the plan. Procedure EPIP-5600, "Emergency Response Training," covers basic as well as specialized training for those emergency response personnel with specific assignments. Training for participating offsite agency personnel involved in emergency response is made available. Procedure EPIP-5600 indicates that emergency preparedness personnel provide orientation tours and/or radiological emergency response training to fire department, sheriff's department, medical and ambulance, and State and County Office of Emergency Services personnel.

#### 3.2.2.11 Safe Condition

Section 5 of the revised emergency plan contains an overview of the reentry and recovery provisions at Rancho Seco. Procedure EPIP-5210, "Reentry/Recovery," provides guidance for closeout of an emergency event, reentry, and recovery operations. In particular, EPIP-5210 includes an emergency closeout checklist to be used by the Emergency Coordinator to determine if the criteria for closeout of an emergency is met.

#### 3.2.2.12 Exercises

Section 8 of the revised emergency plan contains the provisions for periodic drills and exercises. It provides, on an annual basis, for a medical drill, a fire drill, and an exercise affecting the entire site. Offsite organizations are invited to participate in or observe the drills and exercises.

EPIP-5600 provides guidelines to prepare, conduct, and evaluate drills and exercises. The revised plan indicates that the Radiation Protection/Chemistry Group is responsible for developing, planning, scheduling, and conducting drills and exercises. The revised plan states that deficiencies identified must be evaluated and corrected.

The plan allows for quarterly tests of the Rancho Seco emergency communications equipment, including notification telephones, TSC and control room facsimile machines, TSC to control room ringdown telephone and TSC and control room general office telephones. Section 8.6.1 of the revised plan provides for a semiannual verification and update of emergency telephone numbers located in the Emergency Response Telephone Directory (contains the list of qualified emergency response organization personnel and their emergency assignments).

#### 3.2.2.13 Hazardous Chemicals

The revised RSEP states in Section 2.6 that SMUD submits a Business Plan to Sacramento County Environmental Management Department annually and that the Business Plan satisfies the requirements of the Emergency Planning and Community Right-to-Know Act of 1986, Title III, Public Law 99-499, with respect to hazardous materials.

#### 3.2.2.14 Comments on the Plan

The licensee has obtained comments from offsite response organizations (Sacramento County and State of California) on its revised emergency plan. These comments have been provided to the NRC. Section 8.4 of the revised plan indicates that changes to the plan or EALs will be reviewed with the State of California and the Sacramento County.

#### 3.2.2.15 Assistance

Section 4 of the revised RSEP contains a description of the provisions and arrangements for assistance from offsite response organizations in the event of an emergency. This includes arrangements for medical, fire, and law enforcement support from local services that are outlined in letters of agreements between SMUD and the corresponding local services. The revised plan also includes a description of the governmental support agencies: Sacramento County Office of Emergency Operations, California Office of Emergency Services, California Department of Health Services, and the Nuclear Regulatory Commission.

#### 3.2.2.16 Arrangements Made For Providing Information to the Public

Section 7.3 of the RSEP states that news releases to the public are disseminated by SMUD public information personnel, who are located at the SMUD headquarters in Sacramento, California. In accordance with EPIP-5010, "Notification/Communication," the licensee's On-Call Media Services Representative is responsible for responding to all news media inquiries about the emergency event. The On-Call Media Services Representative is notified of the emergency in the emergency notification process.

#### 4.0 CONCLUSION

The staff has determined that the changes to the relevant emergency planning requirements of 10 CFR Part 50 as stated in the licensee's 50.54(q) evaluation do not decrease the effectiveness of the plan, and concludes that the licensee's revised Rancho Seco Emergency Plan continues to meet the non-exempted emergency planning requirements contained in 10 CFR Part 50 that are applicable to the permanently shutdown and defueled condition of the plant. In addition, the staff concludes that the revised Rancho Seco Emergency Plan meets the emergency planning requirements contained in 10 CFR Part 72 for an ISFSI not located on the site of an operating nuclear power reactor, and thus provides for an acceptable level of emergency preparedness at the Rancho Seco site.

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