



**Pacific Gas and
Electric Company**

Loren D. Sharp
Director/Nuclear Plant Manager
Humboldt Bay Power Plant
1000 King Salmon Avenue
Eureka, CA 95503

PML 13-18

October 23, 2013

Texas Low-Level Radioactive Waste Disposal Compact Commission (TLLRWDC)C)
333 Guadalupe St. #3-240
Austin, TX 78701

TEXAS LOW-LEVEL RADIOACTIVE WASTE DISPOSAL COMPACT COMMISSION REQUEST
FOR AMENDMENT TO CURRENT YEAR'S IMPORT APPLICATION

Dear Commissioners:

Please consider this letter a request to amend our current Import Agreement #2-0028-00, as amended by #2-0028-01. As appropriate, please include this amendment request in the November 21st, 2013 TLLRWDC meeting's agenda.

This amendment includes waste described as Resin Processing Sludge that may include Class A waste as an acceptable waste classification as part of the current HBPP Import Agreement. This waste has been collected into drums in the course of HBPP's D&D activities, and doesn't fit the currently approved HBPP waste streams (Resin and Irradiated hardware). The new profile has been generated and submitted for approval to Waste Control Specialists (WCS). I have attached a copy of Annex A in support this request.

Should you require additional information, please contact John Kristofzski at 707/444-0880.

Sincerely,

Michael Strehlow
Michael Strehlow Dep. Director
for

Loren Sharp
Plant Director
Humboldt Bay Power Plant
1000 King Salmon Road
Eureka, CA 95503

Enclosure(s):

TEXAS LOW-LEVEL RADIOACTIVE WASTE DISPOSAL COMPACT COMMISSION

APPLICATION FOR IMPORTATION OF NONPARTY LOW-LEVEL RADIOACTIVE WASTE

(NOTE: PURSUANT TO SECTION 401.207(J), TEXAS HEALTH AND SAFETY CODE, THIS APPLICATION MUST BE COMPLETED BY APPROPRIATE REPRESENTATIVES OF THE DEPARTMENT OF DEFENSE OR THE GENERATOR OF THE WASTE UNLESS THE GENERATOR IS A SMALL GENERATOR AS DEFINED IN SECTION 675.23(0) OF THIS RULE, IN WHICH CASE THE APPLICATION MAY BE SUBMITTED BY AN APPROPRIATELY LICENSED BROKER)

This Annex A has been completed in support of a request to amend HBPP's current Import Agreement # 2-0028-00, as amended by #2-0028-01.

1. Applicant Information:

Entity Name	Pacific Gas and Electric Company, HBPP
Cell Phone	(707) 444-0880
Website address	www.pge.com
Contact Person Phone	John G. Kristofzski
Email	jpgkc@pge.com
Physical Address	1000 King Salmon Ave Eureka, CA, 95503
Mailing Address	Same

Is Applicant:

- Generator
 A Broker who is a: Licensed Waste Processor
 Licensed Waste Collector
 Department of Defense

Notes:

(1) An appropriately licensed Broker may act on behalf of a Small Generator only if each such generator is identified and written authorization from each such generator is provided as an attachment hereto.

(2) While DoD Regulation 4715.6-R designates the Department of the Army as Executive Agent for disposal of low-level radioactive waste, the Commission will require that any agreement that it enters into in this regard be signed by both the Department of the Army as Executive Agent and the branch of the military that has generated the waste.

Generator Type:

<input type="checkbox"/>	Industrial
<input type="checkbox"/>	Academic/Research
<input type="checkbox"/>	Medical
<input checked="" type="checkbox"/>	Utility
<input type="checkbox"/>	Government

Is Applicant the entity responsible for the waste shipment? Yes No

If no, please include the name and contact information for the entity responsible for the waste shipment.

Is Waste from a "Small Generator"? Yes No

2. Term/Duration from Date of Approval: In accordance with the current Import Agreement, # 2-0028-000

3. Waste proposed for importation.

Waste Volume (Cubic Feet),	<u>No additional volume requested</u>
Waste Radioactivity in Curies	<u>No additional activity requested</u>
Place of origination (State) of waste:	<u>California</u>
Waste description:	<u>Irradiated Hardware, Reactor Internals from HBPP Resins, from HBPP, and Resin Processing Sludges</u>

Waste classification (Class A, Class B, or Class C): Class A, Class B & Class C

Waste form Stable Unstable

Does waste contain any of the following radionuclides, check box(es) and complete blank(s):

<input checked="" type="checkbox"/>	C-14	<u>As per #2-0028-00, amended by #2-0028-01</u>	<u>millicuries (mCi)</u>
<input checked="" type="checkbox"/>	Tc-99	<u>As per #2-0028-00, amended by #2-0028-01</u>	<u>microcuries (uCi)</u>
<input type="checkbox"/>	I-129	<u></u>	<u>nanocuries (nCi)</u>
<input type="checkbox"/>	Depleted Uranium	<u></u>	<u>microcuries (uCi)</u>
<input type="checkbox"/>	Concentration	<u></u>	<u>(provide units)</u>
<input checked="" type="checkbox"/>	Source of generation	<u>Nuclear Reactor Operations</u>	<u></u>

4. Is the proposed waste a sealed source?

No Yes | Please Explain:

5. Does Broker and/or Generator(s) have any unresolved violation(s), complaint(s), unpaid fee(s), or past due report(s) with the Texas Low-Level Radioactive Waste Disposal Compact Commission?

No Yes | Please Explain: _____

6. Does Broker and/or Generator(s) have any unresolved violation(s), complaint(s), unpaid fee(s), or past due report(s) pending with any other regulatory agency with jurisdiction to regulate radioactive material including, without limitation, the TCEQ?

No Yes | Please Explain: _____

7. **Certifications. Applicant hereby certifies the following.**

a. The information provided herein is complete, accurate and correct.

b. The low-level radioactive waste for which this Application is submitted will be packaged and shipped in accordance with applicable state and federal regulations and is acceptable for disposal at the Compact Facility.

c. The person submitting this Application is authorized by Applicant to commit Applicant to each and every obligation and condition set forth herein and in the Agreement for Importation of Nonparty Compact Waste. A copy of a written document containing such authorization must be attached to this Application.

d. Applicant has delivered to the Compact Facility operator a copy of this Application and the Agreement for Importation of Nonparty Compact Waste (along with any supplements or amendment thereto).

8. **Authorized Signatory:**

John G. Kristofzski

Print or type name

William K. Jansen for John G. Kristofzski

Signature

Strategic Waste Disposal Manager

Title

October 23, 2013

Date