



SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, Box 15830, Sacramento, California 95813; (916) 452-3211

October 31, 1979

Director of Nuclear Reactor Regulation
Attention: Mr. Robert W. Reid, Chief
Operating Reactors, Branch No. 4
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Docket No. 50-312
Proposed Amendment No. 64 Supplement No. 1
Rancho Seco Nuclear Generating
Station, Unit No. 1

Dear Mr. Reid:

Your order of June 27, 1979, required the District to submit Proposed Technical Specifications for modifications in compliance with the Commission's Order of May 7, 1979. Subsequent review by your staff has resulted in agreements with the District to add to the July 2, 1979, proposal. Mr. Mark Rubin (NRC) and Mr. Ron Colombo from my staff have reached mutual agreement to supplement the Proposed Amendment No. 64 with four additional pages of Technical Specifications.

The District submits the following replies to Mr. Rubin's requests.

Item 1 Request:

Reactor trip setpoint (high pressure): Are limiting scram cycles in tech specs...or monitored by alternate procedures?

Reply:

Administrative Procedure AP.17, "Logging of Operational Transients," was telecopied to Mr. Rubin to satisfy this request. The District considers this item resolved.

Item 2 Request:

TS 3.1.2.8: Revise wording on applicability to include more specific guidance. Such wording as the following would be acceptable.

...In the emergency/faulted condition that there is no forced or natural circulation in the reactor coolant system and there is high pressure injection and/or makeup addition, the Reactor Coolant System temperature and pressure shall be limited in accordance with the limit line shown on Figure X. Under the above emergency/faulted conditions, Figure Y will not apply.

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Reply:

Proposed Technical Specification Supplement No. 1 (attached) Section 3.1.2.8 complies with this request.

Item 3 Request:

Provide revised surveillance requirements for testing the operability of the emergency feedwater system. The revised requirements should include the following:

- a. Requirements for tests to be performed on a staggered test basis (i.e., both trains not tested at the same time).
- b. Requirement for all valves including those that are locked, sealed, or otherwise secured in position to be inspected monthly to ensure they are in the proper position.

These should be added to the existing surveillance requirements that determine if the limiting conditions for operation are met.

Reply:

Proposed Technical Specification Supplement No. 1 (attached) Section 4.8.1 and Section 4.8.2 comply with this request.

Item 4 Request:

We have some concern as to the capability of your turbine-driven emergency feedwater pump to cool the plant down to the RHR out in temperature of 230^oF since sat for 280^oF is approximately 50 psia. Demonstrate that your turbine-driven EFW pump has this capability or provide a Technical Specification that requires lighting off the auxiliary boiler system.

Reply:

Discussions between the Rancho Seco Plant staff, Mr. M. Rubin and Mr. S. Israel on October 26, 1979, resolved that this request was not practical and was withdrawn as a request.

Item 5 Request:

Provide safety analyses for the proposed tech spec changes on control grade reactor trips and temperature/pressure emergency limits.

Reply:

The safety analysis for this plant modification Log No. 125 is attached as requested.

Item 6 Request:

Your emergency feedwater (EFW) Technical Specifications do not include the limiting conditions for operation required by item 8 of IE Bulletin 79-05A. Namely, that if no 100% EFW flow path is operable, the plant shall be subcritical within one hour and in hot shutdown within 12 hours or at the maximum safe rate. Revise your LCO's to address this item.

Reply:

Proposed Technical Specifications Supplement No. 1 (attached) Section 3.4.2.3 complies with the first part of this request.

The District continues to have discussions related to the safe conduct for requiring a complete shutdown from 100% power to subcritical within one hour if both Auxiliary Feedwater Systems become inoperable. A shutdown at this rate will increase the probability of a transient that will challenge the Auxiliary Feedwater System unnecessarily. The challenges to the AFW system should be minimized and a controlled shutdown within 12 hours would provide the lowest probability of inducing a transient that would require operation of the AFW system.

The proposed specification is considered the safest method of shutting the unit down during the stated condition.

Item 7 Request:

The proposed technical specifications do not address station operation with the electromatic relief isolation valve closed. In this regard, include reporting requirements in the technical specifications which reflect this mode of operation.

Reply:

The Management Safety Review Committee refused to approve this Technical Specification. The operation of this equipment is monitored by the "On-site NRC Inspector" and he should be the contact if knowledge of the valve position is warranted.

The Committee feels that the Reactor Operators are having unnecessary requirements unrelated to the operation of the reactor. Such demands which are administrative in nature must be minimized and his attention must not be distracted from the safe operation of the unit. The Committee concluded that the NRC should pursue an alternate information channel independent of the Reactor Operator to obtain this information.

In accordance with 10 CFR 50.59, the Sacramento Municipal Utility District proposes to amend its operating license DPR-54 for Rancho Seco Nuclear Generating Station No. 1, by submitting Proposed Amendment No. 64, Supplement No. 1 on November 1, 1979. Today, we are submitting forty (40) copies of

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Proposed Amendment No. 64, Supplement No. 1, which incorporates the pertinent and applicable changes suggested and required by your staff. This submittal is exempt from the requested Class III fee under the provision of Footnote 2 to 10 CFR 170.22. Footnote 2 does permit the exemption of certain types of license amendments from fees. These are:

1. Those in fee Classes I, II and III which result from written Commission request provided that they have only minor safety significance, are to simplify or clarify the license or Technical Specifications and are being issued for the convenience of the Commission, and
2. Orders issued by the Commission pursuant to 10 CFR 2.204.

The Commission requested this revision via an Order from Harold R. Denton (NRC) to J. J. Mattimoe dated June 27, 1979, and the supplement was requested independently by your staff.

Sincerely,

J. J. Mattimoe

J. J. Mattimoe
Assistant General Manager
and Chief Engineer

JJM:RJR:RWC:jim

Subscribed and sworn to before me
this 2d day of January 1980.

Patricia K. Geisler

Patricia K. Geisler, Notary Public in and
for the County of Sacramento, State
of California.

My Commission expires *11-22-83*

