

SACRAMENTO MUNICIPAL UTILITY DISTRICT ☐ 1708 59th Street, Box 15830, Sacramento, California 95813; (916) 452-3211

April 22, 1976

Docket No. 50-312

Mr. R. H. Engelken
Director of Regulatory Operations
NRC Operations Office, Region V
1990 N. California Boulevard
Walnut Creek Plaza, Suite 202
Walnut Creek, California 94596

RE: NRC Inspection Results of March 29 - April 1, 1976 Audit

Dear Sir:

In reply to your inspection conducted by Messrs. R. T. Dodds and M. H. Malmros on March 29 through April 1, 1976, we offer the following explanations and corrective actions which will assure full compliance with NRC requirements.

Appendix A of your letter states:

1. Contrary to Technical Specification 6.5.2 the Management Safety Review Committee had not performed certain review and reporting functions as follows:
 - a. Records do not show that the Committee had reviewed and advised the General Manager on the violation identified by the NRC in June 1975 pertaining to the failure to implement Administrative Procedure No. 26, "Control of Bypasses and Jumpers."
 - b. The minutes for the MSRC meeting of February 27, 1976 were not prepared, approved and distributed within 14 days.

This item is a deficiency.

2. Contrary to Technical Specification 4.4.1.4, a visual examination has not been made annually of the accessible interior and exterior surfaces of the containment structure and its components to uncover any evidence of deterioration which may affect either the containment's structural integrity or leak tightness.

This item is an infraction.

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SMUD Reply to Item 1a

Technical Specifications Section 6.5.2.7 describes the responsibilities of the Management Safety Review Committee. Specifically, the Technical Specifications require review of:

- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.

The June 1975 audit pertaining to the failure to implement Administrative Procedure No. 26, "Control of Bypasses and Jumpers" was described as a "deficiency". The deficiency was not considered a violation as described in your USNRC Office of Inspection and Enforcement Manual, Chapter 0800, "Enforcement Actions". The definitions within this manual separated violations, infractions and deficiencies. Thus, within the context of your definition and our Technical Specifications, the MSRC would not be required to review and report on deficiencies. This was the action that was taken for MSRC review since you issued your Manual on January 17, 1975.

However, since you have given us a different interpretation of Section 6.5.2.7e of the Technical Specifications, corrective actions will be taken to have the MSRC review and report on all noncompliances. The Secretary of the MSRC will be responsible for assigning "Results of NRC Audits" to the agenda for the next scheduled meeting after receiving the notice of noncompliance from the NRC.

SMUD Reply to Item 1b

Technical Specifications Section 6.5.2.10a requires:

Minutes of each MSRC meeting shall be prepared, approved and forwarded to the General Manager within 14 days following each meeting.

The meeting date was February 27, 1976, and the day following the meeting which this specification starts recording the 14 days was February 28, 1976. Fourteen days later is March 13, 1976 which falls on a Saturday. We do not believe that it is the intent of this specification to require preparation, approval, and distribution of MSRC Minutes on weekends since the Management Organization is not available; and the work to issue the minutes would involve unnecessary overtime. The MSRC minutes were actually written March 12, 1976; but they were not typed and distributed until March 15, 1976, the first workday after the deadline.

The MSRC Secretary has been instructed to prepare, approve, and distribute the minutes within the 14 day requirement.

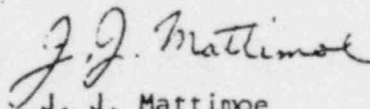
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SMUD Reply to Item 2

This item of noncompliance is concerned with the fulfillment of the requirements of Technical Specifications, Section 4.4.1.4.

While inspections have not been performed in accordance with a procedure specifically addressing itself to Specification 4.4.1.4, the Reactor Building has been the subject of inspections made during the course of the initial structural integrity test performed in February 1974, during containment structural post-tensioning system surveillance tests performed in the first quarter and last quarter of 1975 and during the liner plate surveillance performed in the last quarter of 1975. These tests required visual observations to be made of specified areas of both the interior and exterior surfaces of the Reactor Building where deterioration was most likely to occur. No evidence was found to indicate any deterioration of the structural integrity or leak-tightness of the Reactor Building. Records of these inspections provide evidence that visual inspections designed to detect evidence of potential containment failure have been made, meeting the intent of Specification 4.4.1.4. To assure future compliance with this specification, Surveillance Procedure SP 205.04, "Surveillance of the Reactor Building Interior and Exterior Surfaces," has been prepared. This procedure sets forth the approved method for inspection of the interior and exterior surfaces for evidence of deterioration of the structural integrity or leak-tightness on an annual basis and prior to an integrated leakage rate test. The procedure assures appropriate engineering review of observations made during these inspections and serves as the record of the observations.

Respectfully,



J. J. Mattimoe
Assistant General Manager
and Chief Engineer

cc: J. L. Crews (NRC)
R. Rodriguez (SMUD)
L. Schwieger (SMUD)