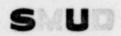
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SACRAMENTO MUNICIPAL UTILITY DISTRICT 
6201 S Street, Box 15830, Sacramento, California 95813; (916) 452-3211

June 14, 1977

Director, Reactor Licensing
Division of Reactor Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Docket No. 50-312
Proposed Amendment No. 32
Revision 2 REISSUE
Rancho Seco Nuclear Generating
Station, Unit No. 1



Dear Sir:

In accordance with 10 CFR 50.59, the Sacramento Municipal Utility District proposed to amend its Operating License DPR-54 for Rancho Seco Nuclear Generating Station, Unit No. 1, by submitting Proposed Amendment No. 32, Revision 2 on February 9, 1977. Today we are submitting forty (40) copies of Proposed Amendment No. 32, Revision 2 Reissue which incorporates the changes suggested by your staff, Dr. Ron Bellamy, Dr. Vern Rooney, and Mr. Lenny Olshan.

This reissue adds specific Limiting Conditions for Operation Applicable to air filter systems and specifies that the methyl iodide removal efficiency of the various charcoal filters be determined at least every 720 hours of filter operation. Wherever possible, this proposed amendment brings the facility ventilation and filter systems into agreement with the latest Standard Technical Specifications and applicable standards.

You will notice in the attached replacement pages, which comprise Proposed Amendment No. 32, Revision 2 Reissue, that the title of Specification 4.11 has changed from "Reactor Building Purge Filtering System" to "Auxiliary and Spent Fuel Building Filter System." This constitutes deleting the current specification on the Reactor Building Purge Filter. The reason is that this filter is not used or required for any analyzed accident at the facility. In addition, if any release of radioactive material should occur during a Reactor Building Purge, the Reactor Building high radiation interlock to the purge fan would terminate the discharge. The Reactor building Purge System penetration valves are Safety Features closed in the facility design accident. Their testing is covered by a separate section in the Technical Specifications. While deletion of this system from the Technical Specifications is justified by its non-safety related function, the system will still be maintained and operated to insure the requirements of Regulatory Guide 1.112 are met. In addition, the environmental effects of a dropped spent fuel assembly in the Reactor Building were analyzed (as reported in the March 21, 1977, letter to Mr. Reid from the District) without taking credit for this filter.

Director. Reactor Licensing

-2-

June 14, 1977

The other significant change by Proposed Amendment No. 32. Revision 2 keissue, is deletion of the requirement to perform an in-place leakage test on the Reactor Building Emergency Filtering System. Since this system is fully contained within the Reactor Building, where it provides recirculation air cleanup in the post-LOCA atmosphere, it satisfies the conditions of ANSI N510-1975, Table 1, for which such testing is unnecessary.

Added to the existing license are new and specific requirements on the Auxiliary and Spent Fuel Building Filter System. The Auxiliary Building service provided by this system had not previously been considered as being safety related. A detailed review of the potential non-LOCA design accidents has revealed that credit has been taken for this filter system in those analyses. Hence, it is now proposed to add requirements to the facility license which will insure that the assumed effectiveness of the filters will be available.

Respectfully submitted.

SACRAMENTO MUNICIPAL UTILITY DISTRICT

Legal Counse Sacramento Municipal

Utility District

Assistant General Manager

and Chief Engineer

Subscribed and sworn to before me this day of June, 1977.

Jean Heslep, Notary Public in and for the County of Sacramento, State of California

My Commission Expires March 11, 1978

JJM: DDW: jim

Enclosure



JEAN HESLEP NOTARY PUBLIC-CALIFORNIA PRINCIPAL OFFICE IN SACRAMENTO COUNTY

My Commission Expires March 11, 1978

♦ DECEMBER CONTRACTOR OF THE PROPERTY OF THE