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

June 4, 1980

Mr. R. H. Engelken, Director
Region V Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
1990 North California Boulevard
Walnut Creek Plaza, Suite 202
Walnut Creek, CA 94596

Re: Operating License DPR-54
Docket No. 50-312
IE Bulletin 80-12

Dear Mr. Engelken:

In response to your letter of May 9, 1980, which transmitted the subject IE Bulletin, the Sacramento Municipal Utility District is hereby submitting the required response.

As a result of IE Bulletin 80-12 (Loss of Decay Heat Removal System at Davis-Besse), an operational assessment was performed on that incident. Two distinct differences between the Davis-Besse and Rancho Seco DHR/ECCS systems preclude the probability of a similar occurrence at Rancho Seco. These differences are:

a. At Rancho Seco, the DHR system suction valves from the RCS (HV-20001 and 20002) are not automatically closed for containment isolation on an ECCS signal.

b. At Rancho Seco, the Reactor Building Emergency Sump isolation valves are not automatically opened on an ECCS signal.

However, minor interruptions of decay heat flow can occur at Rancho Seco. The most probable cause would be the tripping or loss of a 120V vital power inverter. This would result in the RCS pressure transmitters (PT-21092 and 21099) indicating a high RCS pressure and causing the interlocked DHR suction valve(s) (HV-20001 and 20002) to close. A second interlock between the valve(s) and the pump(s) would then trip the operating DHR pump(s). In the event of such an incident, DHR flow can be reestablished by either restoring 120V vital power or dispatching an operator to manually open the DHR suction valve. Such an event would not allow air to enter the system and therefore, time-consuming venting of the system prior to reestablishing flow would not be necessary.

During the recent refueling outage a situation arose where the DHR system redundancy was degraded. This situation was initiated by mechanical failure of the "A" DHR pump seal. This was reported to your office via LER 80-5.

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Recognizing the aspects of degraded redundancy, an analysis of plant procedures for diversity of DHR capability and adequacy of responding to DHR-loss events ensued. This resulted in a special order to all operating personnel (SO 1-80 dated January 28, 1980), giving specific instructions on providing alternate core cooling in the event of a loss of both DHR systems. These detailed instructions were later incorporated into Emergency Procedure D.16, Loss of Decay Heat Removal System, on March 17, 1980.

At the present time, both administrative controls and safeguards against DHR degradation at Rancho Seco are deemed satisfactory. A possible future change to alleviate or minimize the possibility of DHR flow interruption on loss of 120V vital power is presently being studied. Whether this additional safeguard is implemented will depend upon the review and recommendations of the Management Safety Review Committee.

Respectfully submitted,

J. J. Mattimoe

J. J. Mattimoe
Assistant General Manager
and Chief Engineer

JJM:HH:jim

Sworn to and subscribed before me
this 5th day of June, 1980.

Patricia K. Geisler
Notary Public

OFFICIAL SEAL
PATRICIA K. GEISLER
NOTARY PUBLIC - CALIFORNIA
PRINCIPAL OFFICE IN
SACRAMENTO COUNTY
My Commission Expires November 22, 1983