

APPENDIX A
NOTICE OF VIOLATION

Sacramento Municipal Utility District
Sacramento, California

Docket No. 50-312
License No. DPR-54

This refers to the inspection conducted by NRC representatives of the Region V (San Francisco) office at the Rancho Seco Nuclear Generating Station of activities authorized by NRC License No. DPR-54.

Based on the inspection conducted during February 1980, it appears that certain of your activities were in noncompliance with NRC requirements, as noted below.

- A. NRC's Exemption to 10 CFR 50, paragraph 50.46(a) dated December 15, 1978, conditioned the facility license in paragraph IV (1), as follows:

"Until implementation of the modifications...the facility shall be operated in accordance with the procedures for operator action described in licensee's letter dated April 14, 1978, as supplemented by letters dated April 21 and July 7, 1978, except that the maximum time for completion of operator action shall be 10 minutes after initiation of the event." The April 21, 1978 letter incorporated by reference in the Exemption states, in part, "Operating procedures have been implemented at Rancho Seco Unit 1 which require one of the two valves in the high pressure injection cross-connect line to remain open during plant operation."

Contrary to the requirements of the above Exemption License Condition and without implementation of the modifications, the two valves in the high pressure injection cross-connect line (SIM-038 and SIM-039) were closed during the period of December 17 through December 27, 1979. The two valves were closed as the result of the licensee failing to adequately implement procedure (A.15) for operating the Makeup, Purification and Letdown System. During this entire period of time, the reactor was being operated at levels above 90% of rated power.

This is a violation, and had the potential for causing or contributing to an occurrence related to safety. Each day or fraction thereof that the facility was operated with both valves in the high pressure injection cross-connect line closed, constitutes a separate violation; a civil penalty of \$5,000 is imposed for each (cumulative civil penalty \$55,000).

- B. Technical Specification 3.3.1 reads, in part, "The reactor shall not remain critical, unless the following conditions are met: ...Two out of three high pressure injection pumps shall be operable...The manual valves in the suction and discharge lines of all operable heat exchangers served by the nuclear service raw water system are locked in their throttled or open position." Technical Specification 1.3 reads, "A component or system is operable when it is capable of performing its intended function within the required range..."

800417015

Contrary to the above, the reactor remained critical and was operated at a level greater than 10% of rated power between December 17, 1979, and January 9, 1980, except for a 16-hour shutdown period on January 5, 1980, with only one of the three high pressure injection pumps operable. The "B" HPI pump was out of service to permit modifications for fire protection purposes. The makeup pump, that was being used at the time as a high pressure injection pump, was inoperable as a high pressure injection pump because manual valves in the Nuclear Service Raw Water suction and discharge lines for the makeup pump lube oil and room air coolers were closed. These valves were closed as a result of the licensee failing to maintain procedure (A.15) for operating the Makeup, Purification and Letdown System to reflect changes made in the Locked Valve List (SP 214.03).

This is an infraction. Each day or fraction thereof that the facility was operated without the required high pressure injection pumps operable, constitutes a separate violation; a civil penalty of \$4,000 is imposed for each (cumulative civil penalty \$84,000).

- C. Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering activities recommended in Appendix 'A' of Regulatory Guide 1.33, November 1972. The established procedure for operating the Makeup, Purification and Letdown System, A.15, controls the removal of high pressure injection pumps from service for maintenance and their restoration to service. Procedure A.15, Revision 8, Step 7.15.12.1, dealing with restoring the "B" high pressure injection pump to service, reads, "Change makeup tank isolation valve SFV-23508, power supply from 52-2B166 to 52-2A172 and place A key interlock to CLOSE at H8DSFV-23508 in makeup pump room."

Contrary to the above requirements, on January 9, 1980, when the "B" high pressure injection pump was returned to service and the makeup pump was removed from service as a high pressure injection pump, the operator failed to change the power supply from 52-2B166 to 52-2A172, thereby leaving SFV-23508 without electrical power and incapable of closing as required upon initiation of a Safety Features Actuation Signal. This condition was corrected on January 10, 1980.

This is an infraction (Civil Penalty - \$3,000).

This Notice of Violation is sent pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. The Sacramento Municipal Utility District is hereby required to submit to this office within twenty days of the receipt of this Notice, a written statement or explanation in reply, including for each item of noncompliance: (1) admission or denial of the alleged item of noncompliance; (2) the reasons for the item of noncompliance if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further items of noncompliance; and (5) the date when full compliance will be achieved.

The total civil penalties for all items cited is \$142,000. However, pursuant to Section 234 of the Atomic Energy Act of 1954, as amended, (42 USC 2282), the total civil penalties for any 30 day period cannot exceed \$25,000. Consequently, \$117,000 has been subtracted to reduce the total penalties to \$25,000 for the 30 day period beginning December 17, 1979 and ending January 15, 1980.