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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555  
April 2, 1980

Docket No. 50-312

Mr. J. J. Mattimoe  
Assistant General Manager and  
Chief Engineer  
Sacramento Municipal Utility District  
6201 S Street  
P. O. Box 15830  
Sacramento, California 95813

Dear Mr. Mattimoe:

During the week of March 10, 1980, NRC staff members visited the Rancho Seco Nuclear Generating Station and met with members of your staff as well as officials from Sacramento, San Joaquin and Amador Counties. The purpose of this visit was to review the status of emergency planning for the Rancho Seco site.

The review of the draft Rancho Seco Emergency Plan was discussed in detail on March 13, 1980. Since insufficient time was available to discuss all of our concerns, it was agreed that we would transmit the results of our evaluation to you by letter. It was also agreed that within five weeks of receipt of this letter, a revised Emergency Plan resolving our comments would be submitted to us.

In accordance with our agreements, the enclosure details the results of our review. Please submit your revised plan within five weeks of receipt of this letter.

Sincerely,

Robert W. Reid, Chief  
Operating Reactors Branch #4  
Division of Operating Reactors

Enclosure:  
Results of Emergency Plan  
Evaluation

cc w/enclosure:  
See next 2 pages

8004170209

Sacramento Municipal Utility  
District

cc w/enclosure(s):

David S. Kaplan, Secretary and  
General Counsel  
6201 S Street  
P. O. Box 15830  
Sacramento, California 95813

Sacramento County  
Board of Supervisors  
827 7th Street, Room 424  
Sacramento, California 95814

Business and Municipal Department  
Sacramento City-County Library  
828 I Street  
Sacramento, California 95814

Director, Technical Assessment  
Division  
Office of Radiation Programs  
(AW-459)  
U. S. Environmental Protection Agency  
Crystal Mall #2  
Arlington, Virginia 20460

U. S. Environmental Protection Agency  
Region IX Office  
ATTN: EIS COORDINATOR  
215 Fremont Street  
San Francisco, California 94111

Mr. Robert B. Borsum  
Babcock & Wilcox  
Nuclear Power Generation Division  
Suite 420, 7735 Old Georgetown Road  
Bethesda, Maryland 20014

Thomas Baxter, Esq.  
Shaw, Pittman, Potts & Trowbridge  
1800 M Street, NW  
Washington, D. C. 20036

Herbert H. Brown, Esq.  
Lawrence Coe Lanpher, Esq.  
Hill, Christopher and Phillips, P. C.  
1900 M St., NW  
Washington, D. C. 20036

Helen Hubbard  
P. O. Box 63  
Sunol, California 94586

Christopher Ellison, Esq.  
Dian Grueuich, Esq.  
California Energy Commission  
1111 Howe Avenue  
Sacramento, California 95825

Ms. Eleanor Schwartz  
California State Office  
600 Pennsylvania Avenue, S.E., Rm. 201  
Washington, D.C. 20003

Docketing and Service Section  
Office of the Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Resident Inspector  
P. O. Box 48  
Fair Oaks, California 95628

Dr. Richard F. Cole  
Atomic Safety and Licensing Board  
Panel  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Frederick J. Shon  
Atomic Safety and Licensing Board  
Panel  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Elizabeth S. Bowers, Esq.  
Chairman, Atomic Safety and  
Licensing Board Panel  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

James S. Reed, Esq.  
Michael H. Remy, Esq.  
Reed, Samuel & Remy  
717 K Street, Suite 405  
Sacramento, California 95814

Mr. Michael R. Eaton  
Energy Issues Coordinator  
Sierra Club Legislative Office  
1107 9th St., Room 1020  
Sacramento, CA 95814

Sacramento Municipal Utility  
District

cc w/enclosure(s):

Atomic Safety and Licensing Board  
Panel  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Atomic Safety and Licensing Appeal  
Board Panel  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

California Department of Health  
ATTN: Chief, Environmental  
Radiation Control Unit  
Radiological Health Section  
714 P Street, Room 498  
Sacramento, California 95814

Results of the Rancho Seco Emergency Plan Evaluation

<u>Plan Section</u>	<u>Remarks</u>
2.3.3.e, p 2-8	Delete statement given for the NRC and replace with the following: The role of the NRC during a radiation emergency is that of verifying that emergency plans and procedures have been implemented, assuring that the public health and safety are protected, and conducting investigative activities associated with the incident. The NRC will assist in coordination of Federal response resources and provide to the licensee, state, and local agencies advisory assistance associated with assessing and mitigating hazards to the public. In the extreme, this could include directing utility management to take certain actions.
4.1, p 4-1	Statement regarding consistency of the utility emergency classification system with the state and local scheme is not yet true since these plans have not been revised.
4.1.1, p 4-2 4.1.2, p 4-4 4.1.2(SIC), p 4-5 4.1.4, p 4-7	To the sentences beginning with "The Emergency Action . . ." add after "Levels", "or events"
4.1.1.2, p 4-2	Either the appropriate limits should be specified or the appropriate EPIP where they can be found should be referenced.
4.1.4.4, p 4-8	How will the projected dose determinations be made based on high-range rad monitor readings? Cannot actual rad monitor readings be used as a possible EAL for the general emergency class?
6.5.1, p 6-10	Consideration should be given to identify, train, and appraise individuals of the risks in advance. Is the Emergency Coordinator the <u>only</u> one who may authorize emergency exposures? If so, it should be explicitly stated.



The Ranch Seco Emergency Plan was reviewed against the criteria contained in NUREG 0654. The following is a list of the specific criteria that need to be addressed or expanded upon. Where appropriate, additional remarks are included to clarify how the specific criteria should be addressed.

<u>NUREG 0654 Criteria Reference</u>	<u>Remarks</u>
B.4	On p. 6-2, seventh line, delete "Interim". The plan should explicitly identify who is responsible for notifying and making recommendations to offsite authorities.
B.5	The staffing requirements are presented in NUREG 0654, Table B-1 for comment. Present staffing is approximately 6 or 7 personnel with no Rad/Chem technician on the back shifts.
C.1.a	
C.2	
C.3	
D.1	Example EALs established at the Trojan and Zimmer facilities were provided. The plan should strive to achieve a similar level of specificity regarding actual EALs based on instrumentation readings.
D.2	Not all example initiating events for each accident class from NUREG 0654 have been used. Insure that omissions are justifiable. Delete Table 4-1 and integrate the postulated accidents as example events in the appropriate emergency class.
E.2	Either commit to the existence of these procedures or amend the Appendix A to reflect that these procedures are covered.
E.3, 4, 6, 7	
F.1.e	Same as E.2 above.

NUREG 0654 Criteria Reference

Remarks ..

F.2

Change p 8-3, paragraph 8.1.a, to reflect monthly test.

G.1, 2, 3, 5

H.5.b

A description of the provisions to meet the TMI lessons learned criteria (NUREG 0585) specifically with regard to 1) instrumentation for detection of inadequate core cooling, 2) high range effluent and containment monitors, and 3) post accident sampling and in-plant iodine measurement capabilities should be detailed in the plan.

H.6.b.8

H.12

Use of the EOF as the central point for receipt and analysis of all field monitoring data should be documented in the plan.

I.1

See remarks on D.1, 2.

I.2

See remarks on H.5.c.

I.3.a, b, 4, 5, 6, 7, 8

I.9

This discussion should include the potential sources of aircraft use for purposes of radiological monitoring, and the specific utility and other specific resources available for field monitoring, i.e., number of personnel and type of equipment.

I.10

J.2, 4, 5c., 7, 8, 10.a, b, c, m

K.2

See comment on section 6.5.1, p-10 of the plan.

K.3, a, b, 5.a, b, 6.a, b, c, 7

L.1

M.1, 2, 3, 4

NUREG 0654 Criteria Reference

Remarks ..

POOR ORIGINAL

N.1.a, b, 2.a, d, e(1), (2), 3.a, b, c, d, f, 5

O.2, 4.i, 5

P.1, 4, 7, 8, 9