

U. S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT

REGION V

Report No. 50-312/80-01

Docket No. 50-312 License No. DPR-54 Safeguards Group \_\_\_\_\_

Licensee: Sacramento Municipal Utility District  
P. O. Box 15830  
Sacramento, California 95813

Facility Name: Rancho Seco

Inspection at: Clay Station, California

Inspection conducted: January 17 - 26, 1980

Inspectors: *M. Johnson* 3/3/80  
*for* G. B. Zwetzig, Reactor Inspector Date Signed

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 Date Signed

Approved By: *B. H. Faulkenberry* 3/17/80  
 B. H. Faulkenberry, Chief, Reactor Projects Section 2, Reactor Operations and Nuclear Support Branch Date Signed

Summary: \_\_\_\_\_

Inspection on January 17-26, 1980 (Report No. 50-312/80-01)

Areas Inspected: Routine unannounced inspection of progress in completion of required fire protection modifications, major surveillance performed during a refueling outage; major maintenance performed during a refueling outage; followup of unresolved items; and followup of IE Bulletins and Circulars. The inspection involved 64 inspector-hours onsite by one inspector.

Results: Of the five areas inspected, no items of noncompliance or deviations were found.

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## DETAILS

### 1. Persons Contacted

- \*R. Colombo, Technical Assistant
- R. Wichert, Plant Mechanical Engineer
- J. King, Shift Supervisor
- J. Sullivan, Senior Quality Control Engineer
- \*P. Oubre', Plant Superintendent
- \*W. Ford, Operations Supervisor
- \*R. Miller, Chemical and Radiation Supervisor
- \*H. Heckert, Nuclear Engineering Technician
- \*R. Lawrence, Site Project Engineer
- \*G. Coward, Maintenance Supervisor
- \*B. Stiver, Mechanical Engineer
- \*J. McColligan, Manager, Engineering and Quality Control
- D. Whitney, Nuclear Engineer

The inspector also talked with and interviewed several other licensee employees including an auxiliary operator, a design engineer and a construction inspector.

\*Denotes those attending the exit interview.

### 2. Licensee Action on Previous Inspection Findings

(Open) Unresolved Item (79-20-01): QA classification of components not clearly identified. The inspector inquired as to the licensee's progress in providing a more comprehensive and less ambiguous identification of structures, systems and components subject to the facility Quality Assurance Program. The licensee indicated that a revision to Quality Assurance Procedure Number 3 had been prepared to correct this condition and that this revision was under review by management. This item will be followed up at a subsequent inspection.

### 3. Surveillance During a Refueling Outage

Licensee Surveillance Procedure (SP) 203.01A, "SFAS Digital Channel 1A Refueling Test," Revision 4, dated January 17, 1980, was selected as the subject for this inspection. This procedure tests operation of selected portions of Train A of engineered safety features including high pressure injection, containment isolation, containment emergency cooling, and starting of the Train A diesel generator. The inspector verified that the test was covered by a properly approved procedure and that the most recent revision of the procedure was utilized by the operating staff. The inspector reviewed the procedure and did not identify any inconsistencies with regulatory requirements, licensee commitments, or administrative controls. The inspector also witnessed a portion of the test and verified on a sampling basis that test prerequisites were met, that data were properly recorded, that test personnel were properly qualified, and that the test results were acceptable.

No items of noncompliance or deviations were identified.

4. Fire Protection Modifications

The inspector performed further review of the status of completion of the numerous fire protection modifications required by the facility license to be completed by the end of the 1979-1980 refueling outage (the initial phase of this review was reported in Inspection Report Number 50-312/79-26). The inspection during this visit consisted of identification of the design change documentation associated with approximately 50% of the required changes and review of these documentation packages to verify on a sampling basis that the design of the modifications conformed to license requirements. No deviations from license requirements were identified as a result of this review.

The documentation for each of the remaining changes will be reviewed on a sampling basis at a subsequent inspection during the refueling outage. Verification of installation of the required modifications and review of test or construction inspection results will also be performed on a sampling basis at a subsequent inspection to be performed at a time approximately coinciding with the end of the refueling outage.

Based on the portion of the inspection completed to date, no items of noncompliance or deviations were identified. (80-01-01)

5. Maintenance During a Refueling Outage

The inspector performed a preliminary review of the licensee's maintenance procedure M.30, "Incore Monitor Handling and Disposal," Revision 6, and discussed the procedure with the cognizant engineer. The inspector also observed a portion of the procedure involving preparation for withdrawal and disposal of depleted incore detectors. Additional review and observation of the procedure will be performed at a subsequent inspection.

Based on the portion of the inspection completed during this visit no items of noncompliance or deviations were identified. (80-01-02)

6. Followup on IE Bulletins and Circulars

The inspector discussed the licensee's status with respect to outstanding IE Bulletins and Circulars. Significant conclusions or items of information are summarized below:

a. IE Bulletin 79-14 (Open)

In discussions with the licensee's representative the inspector determined that the inspections required by this bulletin were being performed by onsite Bechtel personnel and that the evaluation of the results relative to the corresponding seismic analyses was performed by personnel at the Bechtel offices in Norwalk, California. Since the individuals who developed the inspection elements were also located in Norwalk, the inspector

was unable to interview or determine the qualifications of those who developed the inspection elements. The inspector did, however, review the licensee's list of inspection elements as given in his letter of July 30, 1979 and concluded that these appeared appropriate. The inspector also discussed with the licensee the acceptance criteria used in the reanalysis of nonconformances and concluded these were acceptable. Review of the licensee's submittals, however, did not show justification as to why operability was not impaired in some instances where significant discrepancies in geometry were identified. Observation of the physical inspection of piping systems was not performed while such inspections were actually in progress. The physical inspection results, however, will be verified on a sampling basis during a subsequent inspection.

Based on discussions with the licensee and on the dates of submission of documentation the inspector concluded that evaluations of inspection results had been initiated in a timely manner. It was also noted that in the two instances where the licensee's initial evaluation of results identified potential inoperability, these conditions were reported (LERS 79-14 and 79-15) in accordance with technical specifications requirements. It was also noted that these conditions were promptly corrected by means of plant modifications.

The inspector verified that all reports due at the time of the inspection had been submitted by the licensee. The licensee had not, however, made distribution of copies of the report as specified in the bulletin. This was brought to the attention of the licensee's representative who stated that the situation would be corrected. Reports remaining to be submitted include a report of the results of inspection of inaccessible piping and the description of QA measures required by paragraph 4.A of the bulletin.

The inspector will verify conformance with the remaining bulletin requirements at a subsequent inspection.

b. IE Bulletin 79-18 (Open)

The inspector discussed with a licensee representative the current status with regard to meeting the bulletin schedule for completion of modifications (to improve evacuation alarm audibility) in accessible areas and the licensee's commitment to complete the needed modifications by December 14, 1979. The licensee stated that the need to perform a retest had delayed completion of the modification, but that the modifications would be completed before the plant resumed operation following the current refueling outage.

c. IE Bulletin 79-28 (Closed)

Based on the licensee's letter of January 7, 1980 which states that Rancho Seco does not employ Model EA180 NAMCO switches in any system, and review of licensee internal documents which confirmed this report, this item is considered closed.

d. IE Circular 79-19 (Closed)

Based on discussions with the licensee and review of internal correspondence, the inspector verified that Circular 79-19 had been received by the licensee and that it had been determined that it was not applicable to Rancho Seco because they do not utilize pumps of the type covered by the bulletin in any safety systems.

7. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on January 25, 1980. The inspector summarized the scope and findings of the inspection. The inspector also stated that his criterion for completion of fire protection modifications prior to resumption of power operations was that the Engineering Change Notices (ECNs) were closed out. The plant superintendent stated that such a criterion was unduly restrictive because closeout of an ECN required incorporation of all drawing revisions on new drawings. Instead, he suggested an alternate criterion of closeout of Work Requests, which required completion of the work and acceptable test results, where appropriate, but did not also require completion of drawing revisions. The inspector stated that this would be an acceptable criterion.