



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

April 14, 1980

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

Re: Operating License DPR-54  
Docket No. 50-312  
Order Modification of License

Dear Mr. Engelken:

The Sacramento Municipal Utility District, owner and operator of the Rancho Seco Nuclear Generating Station, received an Order for Modification of License pursuant to the Code of Federal Regulations Title 10, Part 50, Article 2.204. Section III B requires the licensee to take actions to adopt and implement Administrative Procedures to require independent verification of valving lineups and equipment operability whenever safety-related equipment is removed from or placed into service. The corrective actions are to be completed by April 14, 1980.

In compliance with this condition, District directive was issued by the Nuclear Plant Superintendent on April 14, 1980, effective on that date, that independent verification of valving lineups and equipment is mandatory when any safety-related system or component is removed or placed into service, as defined in Chapter 6 of the Final Safety Analysis Report. These systems include: the High Pressure Injection System, Low Pressure Injection System, Core Cooling System, Reactor Building Atmospheric Cooling System, Reactor Building Isolation System, and Reactor Building Spray System. The Nuclear Service Cooling Water, Nuclear Service Raw Water, Diesel Generator and Auxiliary Feedwater Systems were added to the safety-related list.

In addition, the instrumentation associated with the Reactor Protection System and Safety Features System have been included to require independent verification of valving lineups and operability when removed or placed into service. The directive defined operable within the context of the Technical Specifications and served notice to all personnel that the Limiting Conditions for Operations and Surveillance Standards, Technical Specifications Chapters

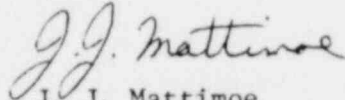
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3 and 4 are the guidelines to meet this definition when removing or returning systems to service.

The Plant Review Committee Charter has been revised to require, during approval of any procedure change, a determination be made of any associated procedures that will be affected. The affected procedures will be documented in the Plant Review Committee minutes and an individual assigned by the Chairman to accomplish the task. To implement this requirement into operation, Administrative Procedure AP-2, "Review, Approval and Maintenance of Procedures", has been revised and adds to the procedural review process. The procedure requires, during Plant Review Committee meetings, that each group supervisor is responsible for procedures to determine if any other procedures are affected. These procedures will have a person designated to incorporate the change and a time stated in the minutes when the affected procedure must be returned to the Plant Review Committee with the change.

The District has met the condition and is in full compliance with Sections III A.1 and III A.2 of the Order.

Respectfully submitted,



J. J. Mattimoe  
Assistant General Manager  
and Chief Engineer

JJM:RWC:jr

cs: Office of Inspection  
and Enforcement  
Washington, D.C.  
Victor Stello

Executive Legal Director  
US Nuclear Regulatory Commission  
Washington, D. C.