



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

May 5, 1980

Dr. Harold Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docket No. 50-312
Rancho Seco Nuclear Generating
Station, Unit No. 1

Dear Dr. Denton:

The Sacramento Municipal Utility District has reviewed the draft version of NUREG-0667, "Transient Response of Babcock & Wilcox - Designed Reactors" dated April 2, 1980 and would like to offer the following comments.

Since the Three Mile Island accident, the District has undertaken many efforts to determine areas for improvement in the Rancho Seco plant design. We are committed to many improvements as a result of the failure modes and effects analysis of the integrated control system, the auxiliary feedwater system reliability analysis in response to NUREG-0578, and in response to our cooldown transient of March 20, 1978 and the Crystal River transient this past February. We feel that these analyses and commitments have not been reviewed adequately by the Staff to determine their impact on the recommendations listed in NUREG-0667. In addition, we feel that plant specific design details have not been properly considered in arriving at the generic recommendations in this report.

We are concerned that an arbitrary schedule may be established for the implementation of the items recommended in this document and encourage the completion of Items 10 and 19 (Sensitivity Studies and Criteria Establishment) as necessary predecessors to the implementation or consideration of the remaining items. We also feel it to be highly desirable to consider these recommendations along with the other items contained in the NRC's Draft Action Plan so that a coordinated and realistic schedule can be developed for implementation of these items.

If you have any questions on our position or desire further discussion, please feel free to contact us.

Sincerely yours,

John J. Mattimoe
John J. Mattimoe
Assistant General Manager
and Chief Engineer

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