



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

May 21, 1980

Mr. R. H. Engelken, Director  
Region V Office of Inspection & Enforcement  
U. S. Nuclear Regulatory Commission  
1990 North California Boulevard  
Walnut Creek Plaza, Suite 202  
Walnut Creek, California 94396

Re: Operating License DPR-54  
Docket No. 50-312  
Reportable Occurrence 80-26

Dear Mr. Engelken:

In accordance with Technical Specifications for Rancho Seco Nuclear Generating Station, Section 6.9.4.1h, and Regulatory Guide 1.16, Revision 4, Section C.2.a(8), the Sacramento Municipal Utility District is hereby submitting a fourteen-day followup report to the reportable occurrence which was initially reported to Mr. D. Sternberg, of your office, on May 8, 1980, and by a confirmation letter on the same day.

On May 8, 1980, the District was informed by Babcock and Wilcox that the calculation of offsite dose following a steam generator tube rupture may be higher than reported in the FSAR. As a result of the ATOG (Abnormal Transient Operating Guidelines) program analysis for ANO-1 concerning the steam generator tube rupture event, B&W has determined that the FSAR analysis for the event may be inaccurate. The ATOG analysis, using more realistic assumptions, resulted in greater reactor coolant mass release to the environment than the FSAR analysis. Some of the factors which contributed to the differences in the analyses include:

1. Recent requirements to maintain 50°F subcooling in the RCS during such an event and small break guidelines regarding RC pump trip which reduce plant depressurization capabilities;
2. Considerations regarding periodic steaming of the affected steam generator to prevent overfilling that generator;
3. Contaminated steam released to the environment via the auxiliary feedpumps exhaust while the affected steam generator is in service during a coincidental loss of offsite power.

A review of the SMUD FSAR analysis and the B&W analysis indicated that the SMUD FSAR analysis with offsite power available is conservative as it stands. This is based on the B&W analysis assuming a buildup of activity in the secondary system which is unrealistic in view of the large partition factor available from the condenser. However, a comparison of the analyses for steam generator tube

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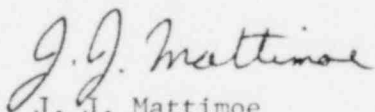
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rupture with loss of offsite power indicates that doses would be higher than calculated in the SMUD FSAR by a factor of approximately two. It should be noted that even with an increase by a factor of two, the calculated doses are well below both 10 CFR 100 and Technical Specification limits.

At the present time B&W is not offering their ATOG analysis as an acceptable substitute for an FSAR-type analysis. Discussions with B&W indicate that they are probably months away from defining what they would consider to be an acceptable FSAR analysis for this accident. In the interim, B&W is developing operator guidelines which cover this type event for ANO-1. Said guidelines will be available to all other utilities. Upon receipt of the guidelines, the District will review them for applicability and incorporation into existing procedures. In the future, a revised FSAR analysis will be forthcoming; however the time frame will be dependent upon additional information and further clarification and definition from B&W.

There were no plant transients nor power reductions associated with this event.

Respectfully submitted,



J. J. Mattimoe  
Assistant General Manager  
and Chief Engineer

JJM:HH:jim

cs: Director, I&E (40)  
Director, MIPC (3)