

SACRAMENTO MUNICIPAL UTILITY DISTRICT C 6201 S Street, P.O. Box 15830, Secremento CA 95852-1830, (916) 452-3211 AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

AGM/NUC 89-169

October 27, 1989

U. S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

Docket No. 52-312 Rancho Seco Nucleor Generating Station License No. DPR-54

NRC BULLETIN MO. 88-11, PRESSURIZER SURGE LINE THERMAL STRATIFICATION; GENERIC LETTER 88-20, INDIVIDUAL PLANT EXAMINATION FOR SEVERE ACCIDENT VULNERABILITIES: AND GENERIC LETTER 88-11, NRC POSITION ON RADIATION EMBRITTLEMENT OF REACTOR VESSEL MATLRIALS AND ITS UMPACT ON PLANT OPERATIONS

Attention: George Knighton

- Reference: 1. SMUD to NRC letter dated June 2, 1989, NRC Bulletin No. 88-11, Pressurizer Surge Line Thermal Stratification
  - SMUD to NRC letter dated March 29, 1989, NRC Position On 2. Radiation Embrittlement of Reactor Vessel Materials and Its Impact on Plant Operations (Generic Letter 88-11)

In reference 1, the District committed to submit additional information on thermal stratification by October 31, 1989. Rancho Seco has entered the shutdown condition and is preparing to defuel the reactor. In addition, the District plans to maintain the plant in a defueled condition for the foreseeable future. Therefore, because the Reactor Coolant System (RCS) is not at elevated temperature, pressurizer surge line thermal stratification is not credible. The District will not perform additional analysis on surge line stratification and will be unable to submit additional information. Prior to any future operation of the facility, we will confer with the NRC to determine what actions will be required to comply with the Bulletin.

In reference 2, the District committed to:

1. Evaluate the heatup/cooldown values to determine what, if any, changes were needed to Technical Specifications and/or procedures. Complete and submit results prior to Cycle 8 operation.

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RANCHO SECO NUCLEAR GENERATING STATION 🖾 14440 Twin Cities Road, Herald, CA 95638-9799; (209) 333-2935

- 2. Update procedures prior to Cycle 8 operation to include restrictions described in the letter.
- 3. Include required Technical Specification changes in the Improved Technical Specification Program submittal scheduled for October 1989.

The District has reviewed the radiation embrittlement issue for Rancho Seco and determined that additional analyses are not required. No additional work or submittals will be made associated with Generic Letter 88-11 at this time: however, prior to any future operation of the facility, we will confer with the NRC to determine what actions will be required to comply with the Generic Letter.

The District has also reviewed Generic Letter 88-20. Individual Plant Examination (IPE) For Severe Accident Vulnerabilities and determined that, with the facility maintaining a defueled condition, severe accidents as would be modeled and analyzed by an IPE are no longer credible. Therefore, the District will not perform an IPE or probabilistic risk assessment as recommended by Generic Letter 88-20 for operating nuclear power plants at this time. However, prior to any future operation of the facility, we will confer with the NRC to determine what actions will be required to comply with the Generic Latter.

Members of your staff with questions requiring additional information or clarification may contact Dave Swank at (209) 333-2935, extension 4920.

SS

State of California

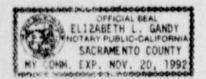
County of Sacramento

Dan R. Keuter, being first duly sworn, deposes and says: that he is Assistant General Manager, Nuclear of Sacramento Municipal Utility District (SMUD), the licensee herein; that he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute this document on behalf of said licensee.

Den Det

Dan R. Keuter Assistant General Manager Nuclear

Subscribed and affirmed to before me on this 27th day of Detaken . 1989.



Elizabeth L. Gandy Notary Public

Notary Public

cc: J. B. Martin, NRC, Walnut Creek A. D'Angelo, NRC, Rancho Seco