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

June 30, 1980

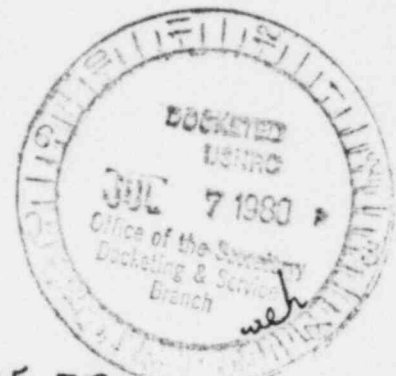
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Docketing and Service Branch

Gentlemen:

DOCKET NUMBER
PROPOSED RULE PR 50 (45 FR 36082)

(44)



The District submitted to the NRC on August 1, 1977, a fire hazard analysis. The analysis was performed in accordance with NRC instructions as defined in Enclosure 2 of the NRC's September 30, 1976 letter to the District. On February 28, 1978, the NRC issued License Amendment No. 19 to the facility operating License No. DPR-54 for the Rancho Seco Nuclear Generating Station. Attached to this licensing amendment was a fire protection safety evaluation report. This report contained all of the modifications that the District and the Staff agreed would be necessary to upgrade the fire protection system at Rancho Seco. The safety evaluation report concluded that when the modifications were implemented the Rancho Seco Nuclear Power Plant would have an adequate fire protection program.

The District has expended two years and \$7 million to implement the required modifications. The District has resolved all outstanding items with the NRC and implemented the modifications on schedule.

On May 29, 1980, the Commission published a new proposed rule on fire protection in the Federal Register (45 FR 36082). Based on a thorough review of the proposed rule, the District has concluded that:

- (a) The proposed rule change modifies and voids existing agreements made between the Staff and the District.
- (b) The proposed rule change includes new requirements that were not within the scope of the original fire hazard analysis and safety evaluation report.
- (c) The proposed rule change is overly specific in design detail, and does not allow for different approaches to accomplish a specific requirement.
- (d) The modifications required by the rule cannot be implemented by the November 1, 1980 deadline. Therefore, unless an extension is granted, Rancho Seco would have to be shutdown for four to six months to implement the modifications.

Administrated by card. 7-7-80. [unclear]

L-4-1, A150

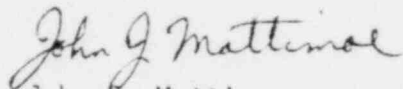
This would cost the customers of Northern California approximately \$440,000 a day. The engineering and construction cost to implement the modifications will approach the \$7 million the District has already spent on fire protection modifications.

Therefore, the District requests that the proposed rule change not be adopted as written. It should be modified to:

- (a) Accept agreements previously made between the Staff and the District.
- (b) Delete many of the new requirements that were not within the scope of the original fire hazard analysis.
- (c) Be rewritten to be less specific and allow greater flexibility to meet the guidelines.
- (d) Allow an implementation schedule that can be worked out between the Staff and the District that is based on the overall fire protection program.

The District's review and specific comments on the proposed rule will be submitted under a separate letter by July 3, 1980.

Sincerely,



John G. Mattimoe
Assistant General Manager
and Chief Engineer