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PACIFIC GAS AND ELECTRIC COMPANY

LAW DEPARTMENT - 77 BEALE STREET, 31ST FLOOR • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211

July 28, 1980

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

Re: Docket No. 50-133
License No. DPR-7

Dear Mr. Engelken:

This is in response to your letter dated June 12, 1980 which enclosed I.E. Bulletin No. 80-14 concerning the degradation of BWR scram discharge volume capability.

The action statements of the Bulletin and our responses are given in Attachment A.

An estimated six man-hours was expended in the review and preparation of this report. We estimate that the corrective actions required by this Bulletin will require approximately 20 man-hours.

Very truly yours,

Philip A. Crane, Jr.

Attachment

CC w/attachment: Office of Inspection and Enforcement
Division of Reactor Operations Inspection
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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PACIFIC GAS AND ELECTRIC COMPANY
HUMBOLDT BAY POWER PLANT NO. 3
DOCKET NO. 50-133
LICENSE NO. DPR-7

ATTACHMENT A
RESPONSE TO I. E. BULLETIN NO. 80-14

I. E. Bulletin 80-14, concerning the degradation of BWR scram discharge volume capability, requested the following actions be taken:

1. "Review plant records for instances of degradation of any SDV level switch which was or may have been caused by a damaged or bent float assembly. Identify the cause and corrective action for each instance."

The required reviews have been performed and no instances of damaged or bent float assemblies have occurred.

2. "Review plant records for instances of degradation of SDV vent and drain valve operability. Provide the closure times required and typically observed for these valves and the basis for the required closing times. Identify the cause and corrective action for each instance of degradation."

The required reviews have been performed and no instances of such degradation have occurred. The SDV vent and drain valves do not have specifically required closing times and their actual closing times are not measured. Routine surveillance of these valves has been limited to observing their proper operation each scheduled refueling outage.

3. "By procedures, require that the SDV vent and drain valves be normally operable, open and periodically tested. If these valves are not operable or are closed for more than 1 hour in any 24 hour period during operation, the reason shall be logged and the NRC notified within 24 hours (prompt notification)."

Procedures implementing these requirements will be provided prior to the time plant status is changed from its present cold shutdown mode following resolution of the site seismic issues.

4. "Review instances in which water hammer or damage which may have been caused by water hammer have occurred in SDV related piping. Identify the cause and corrective action for each instance."

The required reviews have been performed and no such water hammers have occurred in the SDV related piping.

5. "Review surveillance procedures to ensure that degradation of any SDV level switch due to a damaged float or other cause would be detected and that inoperability from any cause would be reported to the NRC."

The required surveillance procedure already exists and is performed each regularly scheduled refueling outage.

6. If no functional test or inspection which would detect degradation of each SDV level switch has been performed during the past 3 months, make provisions to perform an inspection and functional test of all SDV level switch assemblies at the next reactor shutdown of greater than 48 hours duration."

The required test will be performed prior to the time the plant status is changed from its present cold shutdown mode following resolution of the site seismic issues.