



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

October 1, 1980



J. L. Crews, Chief
Reactor Operations and Nuclear
Support Branch
US Nuclear Regulatory Commission
Region V
1990 N. California Boulevard
Walnut Creek, CA 94596

NRC Inspection Report 50-312/80-24

Gentlemen:

This response covers two items of non-compliance and the action taken by the District to prevent recurrence.

Notice of Violation

Facility Technical Specification 6.5.2.8 states in part: "Audits of facility activities shall be performed under the cognizance of the NRC. These audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Technical Specifications...at least once a year."

Contrary to the above, audits had not been performed on an annual or other periodic basis for at least two years prior to the inspection, to determine if the facility was operating in conformance with the "Limiting Safety System Settings," "Limiting Conditions for Operation," and "Environmental Protection Conditions" sections of the Technical Specifications.

This is an infraction.

Response: This infraction was discussed with the NRC Region V Systematic Appraisal Licensee Performance (SALP) meeting with the District on August 26, 1980.

The District agrees that the audits for:

- a. The conformance of facility operation to all provisions contained within the Technical Specifications...at least once a year were not being accomplished.

The District is actively recruiting personnel to perform these audits. If recruitment of qualified personnel is not immediately successful,

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the District will temporarily retain consultants with proper credentials to perform the audits.

Compliance to this requirement should be by December 1, 1980.

Notice of Deviation

By letter dated September 23, 1976 you committed to a quality assurance program incorporating the provisions of WASH document No. 1284. This document references the requirements of ANSI N18.7-1972 (formerly ANS-3.2). Section 4.4 of ANSI N18.7-1972 states in part, "Written reports of such audits shall be reviewed at a scheduled meeting of the independent review and audit group,..."

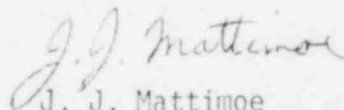
Contrary to the above, although reports of such audits were transmitted to each member of the MSRC (the independent review and audit group for Rancho Seco), there was not a review of each report at a scheduled meeting of the MSRC. Instead, review of audits was accomplished by committee consideration of a list of brief synopses of audits completed since the last review. At the time of this inspection the last review had been conducted in September, 1979 - approximately eleven months earlier. This practice does not meet the intent of Sec. 4.4 of ANSI N18.7-1972, with respect to committee review of the written audit report or with respect to reasonably timely review of audit results.

This is a deviation.

Response: The District will review the audits accomplished since the last MSRC meeting at each regularly scheduled MSRC meeting unless action is taken by the committee to delay. The action to delay shall be taken only when reviews can be rescheduled in a reasonable time.

The next MSRC meeting is scheduled for October 1, 1980; at that time we will be in compliance.

Sincerely yours,



J. J. Mattimoe
Assistant General Manager
and Chief Engineer