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

MALCOLM H. FURBUSH VICE PRESIDENT AND GENERAL COUNCIL

ROBERT OHLBACH ASSOCIATE GENERAL COUNSEL

CHARLES T. VAN DEUSEN PHILIPA CRANE, JR. HENRY U. LAPLANTE JOHN B. GIRSON ARTHUR L. HILLMAN. JR CHARLES W. THISSELL DANIEL E. GIBSON ASSISTANT GENERAL COUNTY

September 4, 1980

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JACE W SHOTK
DAVID WILLIAMSON
BHUCE R. WORTHINGTON

Mr. P. H. Engelken, Director Office of Inspection and Enforcement Region V U. S. Nuclear Regulatory Commission

1990 North California Boulevard Walnut Craek Plaza, Svite 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 August 22, 1980, which transmitted I.E. Bulletin No. 80-17 Supplement 3 concerning failures of control rods to insert during a scram at a BWR.

Item 1 of the subject bulletin required certain procedures to be developed for "those plants in which the scram discharge volume headers are connected to the instrument volume by a 2 inch pipe . . . " This requirement is not applicable to the Humboldt Bay nuclear unit. The plant design uses only a single scram discharge volume which is instrumented for level alarms and a high level scram signal.

Item 2 requested us to provide and implement procedures which require a functional test using water for the instrument volume level alarm, rod block and scram switches after each scram event, before returning to power. This procedure should remain in effect until modifications in addition to Item B.1. of IEB 80-17 Supplement No. 1 are completed to substantially increase reliability of water level indication in the scram discharge volume(s).

The plant is presently in the cold shutdown mode and will remain there until completion of the ongoing geologic investigation. The review, applicable testing, and resolution of any problems will be performed following completion of the geologic investigation and a report of our findings will be forwarded prior to returning to power operation.

! Brown, F

It is estimated that approximately 1 man-hour has been expended to review and respond to the subject bulletin. Additional manpower expended for the final resolution of this bulletin and for corrective action will be reported when those actions are taken.

Very truly yours,

CC: Director

Office of Inspection and Enforcement Division of Reactor Operations Inspection U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Director
Document Management Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555