



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V
1990 N. CALIFORNIA BOULEVARD
SUITE 202, WALNUT CREEK PLAZA
WALNUT CREEK, CALIFORNIA 94596

April 14, 1981

Docket No. 50-312

Sacramento Municipal Utility District
P. O. Box 15830
Sacramento, California 95813

Attention: Mr. J. J. Mattimoe
Assistant General Manager

Gentlemen:

This refers to your letter of March 26, 1981, in which you responded to our letter dated March 2, 1981, and Notice of Violation, dated February 27, 1981.

The District Reply as contained in your letter of March 26 raises continuing concern regarding your program for the review and analysis of changes to safety-related systems of the Rancho Seco plant. In addition, your reply was not totally responsive to our Notice of Violation.

Whereas the District Reply "...admits, in-form, that 'B' Diesel Generator did not have the DC-driven...quick start...described in...the FSAR....", it further states that, "...the Diesel Generator performed within the definition of OPERABLE as stated in the Technical Specification Section 1.3 and Management determined that a 50.59 evaluation was unnecessary."

Our specific continuing concern relates to the Management determination that in the instance described above, a 50.59 evaluation was unnecessary.

Paragraph 50.59(a)(1) states, in part, "The holder of a license...may (i) make changes in the facility as described in the safety analysis report, without prior Commission approval, unless the proposed change...involves a change in the Technical Specifications incorporated in the license or an unreviewed safety question." (Emphasis added.) Paragraph 50.59(a)(2) states, in part, "A proposed change...shall be deemed to involve an unreviewed safety question (i) if the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report may be increased...."

It is our determination that continued operation of the "B" Diesel Generator without the DC-motor driven hydraulic governor quick start system operable constituted a change requiring a written safety evaluation in accordance with Paragraph 50.59(b).

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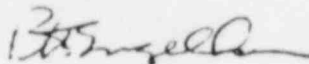
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April 14, 1981

The District Reply also failed to fully respond to our Notice of Violation of February 27, 1981, in that it did not include "... (4) corrective steps which will be taken to avoid further items of noncompliance;..."

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within twenty-five (25) days of the date of this letter, a written statement or explanation in reply to our Notice of Violation dated February 27, 1981, including corrective steps which will be taken to avoid further items of noncompliance of a similar nature.

Sincerely,



R. H. Engelken
Director

cc: W. C. Walbridge, SMUD
R. J. Rodriguez, SMUD
L. G. Schwieger, SMUD