



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

December 15, 1980

Director of Nuclear Reactor Regulation
Attention: Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docket 50-312
Rancho Seco Nuclear Generating
Station, Unit No. 1
TMI Action Plan, NUREG-0737

Dear Mr. Eisenhut:

The Sacramento Municipal Utility District has reviewed your letter of October 31, 1980, which provided us a copy of NUREG-0737, "Clarification of TMI Action Plan Requirements". As requested in your letter, pursuant to 10CFR50.54 (f), the attachment to this letter provides the District's commitments for the implementation of each item in the Action Plan.

The District desires to implement those items in a timely manner which will significantly improve the safety of Rancho Seco Unit No. 1. However, the implementation dates must be consistent with the power requirements in Northern California. We feel the attached commitments represent the best interests of our customers. If we can provide any additional information or justification on these items, please advise.

Sincerely,

John J. Mattimoe

John J. Mattimoe
Assistant General Manager
and Chief Engineer

Attachment

Sworn to and subscribed before me
this 15th day of December, 1980.

Patricia K. Geisler
Notary Public



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SACRAMENTO MUNICIPAL UTILITY DISTRICT
IMPLEMENTATION COMMITMENTS FOR POST-TMI REQUIREMENTS (NUREG-0737)

- I.A.1.1.1 Shift Technical Advisor On Duty
This item has been completed.
- I.A.1.1.2 Technical Specifications
This Technical Specification was included in our Proposed Amendment No. 72, dated October 8, 1980.
- I.A.1.1.3 Training Per Lessons Learned Category B
This item has been completed.
- I.A.1.1.4 Describe Long-Term Program
The District will submit a description of the long-term program by January 16, 1981. NUREG 0737 requests numerous submittals and implementations on January 1, 1981. Where an implementation consists of a submittal, and for all submittals, the District is committing to January 16, 1981 to allow two weeks following the holiday period to compile the massive amount of information requested.
- I.A.1.2 Shift Supervisor Responsibilities
This item has been completed.
- I.A.1.3.1 Shift Manning, Overtime Limitation
This item has been completed.
- I.A.1.3.2 Minimum Shift Crew Size
The District's letter of November 3, 1980 discusses our ability to meet this requirement. The District cannot commit to this item or to request a Technical Specification on this requirement until training and examination results are known.
- I.A.2.1 Immediate Upgrading of Reactor Operator and Senior Reactor Operator Training and Qualifications
The five items described under this title have been completed.
- I.A.2.3 Administration of Training Programs, Instructors Complete SRO Exam
This item has been completed.

- I.A.3.1 Revise Scope and Criteria for Licensing Exams
Items 1 and 2, Increased Scope and Passing Grade, have been completed.
Item 3, Administration of Simulator Examinations, is an item for NRC staff implementation.
- I.C.1.1 Short Term Accident and Procedure Review, Small Break LOCA
This item has been completed.
- I.C.1.2 & 3 Inadequate Core Cooling and Transients and Accidents Guidelines and Procedures
The District is a member of the B&W Owners Group and is therefore participating in their ATOG program. We feel this program satisfies the intent of these requirements. This program will be described in a submittal by January 16, 1981.
- I.C.2 Shift and Relief Turnover Procedures
This item has been completed.
- I.C.3 Shift Supervisor Responsibility
This item has been completed.
- I.C.4 Control Room Access
This item has been completed.
- I.C.5 Feedback of Operating Experience
This item has been completed.
- I.C.6 Verify Correct Performance of Operating Activities
This item has been completed.
- I.D.1 Control Room Design Reviews
The District will respond to this item after the NRC issues NUREG-0700 and proposes an implementation schedule.
- I.D.2 Plant Safety Parameter Display Console
The District will respond to this item after the NRC issues NUREG-0696, Revision 2, and proposes an implementation schedule.

II.B.1.1 Reactor Coolant System Vent Design

The District will submit a design for high point vents by July 1, 1981 as requested. At this time, we are committing to hotleg high point and pressurizer vents only. We do not feel reactor vessel head vents are desirable or necessary.

II.B.1.2 Vent Installation

The District commits to installation by July 1, 1982 as requested for the vents discussed above.

II.B.1.3 Vent Procedures

Procedures will be submitted by January 1, 1982 as requested and implemented when the vents are installed.

II.B.2.1 Plant Shielding Design Review

This item has been completed.

II.B.2.2 Shielding Modifications

The District is presently scheduling an outage for April 1, 1982 for the implementation of Action Plan requirements. These modifications will be made during this outage. Please see the discussion at the end of this attachment for justification of this date.

II.B.2.3 Equipment Qualification

All safety related equipment will be qualified by June 30, 1982, as requested, to the extent possible, consistent with the District's effort to qualify equipment in accordance with the Order for Modification of License Concerning Environmental Qualification of Safety-Related Electrical Equipment dated October 24, 1980. It should be noted that representatives of the District are meeting with the NRC staff on December 18, 1980 for a better policy definition of this order and to determine what future action would be appropriate if relief is determined to be necessary. Any action related to this order would be applicable to this item also.

II.B.3.1 Postaccident Sampling, Interim System

This item has been completed.

II.B.3.2 Plant Modifications

The District will submit a description of the proposed sampling system by January 16, 1981. We commit to the installation of this system during the outage scheduled to begin April 1, 1982. The system will

- II.B.3.2 (continued) not provide the capability of hydrogen analysis since containment hydrogen concentrations will be continuously monitored in the Control Room. Chloride analysis will also not be performed since this analysis will not provide any useful information pertinent to Rancho Seco.
- II.B.4.1 Training for Mitigating Core Damage, Develop Program
The District is committed to developing a training program when the INPO guidelines are available. We understand these will be issued about January 1, 1981.
- II.B.4.2 Program Implementation
The District does commit to initiate training by April 1, 1981 and have the initial program completed by October 1, 1981 as requested.
- II.D.1.1 Relief and Safety Valve Test Requirements, Submit Program
As a sponsor of the EPRI PWR Safety and Relief Valve Test Program, the District intends to comply with the requirements of NUREG 0578, Item 2.1.2. By letter dated December 15, 1980, R. C. Youngdahl of Consumers Power Company has provided the current PWR Utilities' positions on NUREG 0737, Item II.D.1 clarifications.
- II.D.1.2 Complete Testing and Plant Specific Report
Please refer to Item II.D.1.1.
- II.D.1.3 Block Valve Testing
Please refer to Item II.D.1.1.
- II.D.3.1 Valve Position Indication Installation
This item has been completed. It should be noted, however, that equipment qualification data has not yet been received. This qualification is discussed in our letter of April 11, 1980 and the NRC's evaluation dated May 1, 1980. We expect to receive this data within the next month.
- II.D.3.2 Technical Specifications
These Technical Specifications were included in the District's Proposed Amendment No. 72, dated October 8, 1980.
- II.E.1.1 Auxiliary Feedwater System Evaluation
The District submitted a letter to the NRC on November 17, 1980, discussing an upgraded auxiliary feedwater system. As discussed in that letter, the District is committed to

- II.E.1.1 (continued) a major upgrade of the auxiliary feedwater system during the first extended outage following equipment delivery in 1982. The reliability analysis of the auxiliary feedwater system performed shortly after the Three Mile Island accident identified two system improvements. The automatic loading of the pump motor on an emergency diesel generator will be accomplished when two new additional diesel generators are installed at Rancho Seco. These units are being installed to provide backup emergency power for new additional loads and are presently not expected to be operational until late 1983. Modification of valve FWS-055, so that both trains of auxiliary feedwater are not taken out of service to perform a system test, will be performed during the plant outage presently scheduled for April 1, 1982. Please see the discussion at the end of this attachment for justification of this date instead of the requested July 1, 1981 date.
- II.E.1.2.1.a Control Grade Auxiliary Feedwater System Initiation
This item has been completed.
- II.E.1.2.1.b Safety Grade Initiation
This item is included in the major system upgrade discussed in Item II.E.1.1.
- II.E.1.2.2.a Control Grade Flow Indication
This item has been completed.
- II.E.1.2.2.b Technical Specifications
These Technical Specifications were included in the District's Proposed Amendment No. 72, dated October 8, 1980.
- II.E.1.2.2.c Safety Grade Flow Indication
The District can accomplish this modification independent from the major system upgrade as discussed in our November 17, 1980 letter. This modification will occur during the plant outage scheduled to begin April 1, 1982. A discussion is provided at the end of this attachment providing the District's reasons for selecting this date instead of July 1, 1981 for this modification.
- II.E.3.1.1 Upgrade Power Supply for Pressurizer Heaters
This item has been completed.
- II.E.3.1.2 Technical Specifications
This Technical Specification was included in the District's Proposed Amendment No. 72, dated October 8, 1980.

- II.E.4.1.1 Dedicated Hydrogen Penetration Design
This item has been completed.
- II.E.4.1.2 Dedicated Hydrogen Penetration Installation
The District commits to make these modifications during the outage scheduled to begin April 1, 1982. A discussion appears at the end of this attachment providing justification for that date in lieu of the July 1, 1981 date requested.
- II.E.4.2.1-4 Containment Isolation Dependability, Diverse Isolation
These items have been completed.
- II.E.4.2.5 Containment Pressure Setpoint
The District will submit a discussion justifying the existing setpoint by January 16, 1981. Modifications are not anticipated so we are not committing to modifications by July 1, 1981.
- II.E.4.2.6 Containment Purge Valves
The District has committed to this item by letter dated January 18, 1980.
- II.E.4.2.7 Radiation Signal on Purge Valves
The District commits to make a submittal on this item by July 1, 1981.
- II.E.4.2.8 Technical Specifications
A Technical Specification was included in the District's proposed Amendment No. 72, dated October 8, 1980.
- II.F.1 Accident Monitoring
The District commits to these six modifications during the outage scheduled to begin April 1, 1982. We are attempting to purchase equipment in full compliance with Appendix B to NUREG-0737, and will inform you of any deviations from these requirements when and if they become apparent.
- II.F.2.1 Instrumentation for the Detection of Inadequate Core Cooling, Subcooling Meter
This item has been completed. Inputs are being upgraded to safety grade. This effort will be completed during the outage scheduled to begin April 1, 1982.

- II.F.2.2 Technical Specifications
- This Technical Specification was included in the District's proposed Amendment No. 72, dated October 8, 1980.
- II.F.2.3 Level Instrumentation
- The District's position on the addition of primary system level indication has been presented in letters dated March 5, 1980, August 28, 1980, and October 29, 1980. We feel that instrumentation does not exist, which satisfies your requirements; however, we will continue to follow the development of such technology. At this time, we cannot commit to the implementation requested. By January 16, 1981 we will submit details of our planned system to the extent possible.
- II.G.1.1 Upgrade Power Supplies for Pressurizer Relief Valves, Block Valves, and Level Indicators
- This item has been completed.
- II.G.1.2 Technical Specifications
- This Technical Specification was included in the District's proposed Amendment No. 72, dated October 8, 1980.
- II.K.1 IE Bulletins
- This item is complete.
- II.K.2.8 Upgrade Auxiliary Feedwater System
- Please refer to Item II.E.1.1.
- II.K.2.9 FEMA on ICS
- This item has been completed.
- II.K.2.10 Safety Grade Reactor Trip
- This item will be implemented during the outage scheduled to begin April 1, 1982. Please see the discussion at the end of this attachment concerning justification for this date instead of July 1, 1981.
- II.K.2.11 Operator Training and Drilling
- This item is complete.
- II.K.2.13 Thermal Mechanical Report
- The District will submit the requested report by January 16, 1981

- II.K.2.14 Lift Frequency of PORV's and SV's
Please see Item II.K.3.7.
- II.K.2.15 Effects of Slug Flow on OTSG's
This item is complete.
- II.K.2.16 Reactor Coolant Pump Seal Damage
This item is complete.
- II.K.2.17 Voiding in the Reactor Coolant Pump System
This item is complete.
- II.K.2.19 Benchmarked Analysis of Sequential Auxiliary Feedwater Flow
This item is complete.
- II.K.2.20 System Response to Small Break LOCA
This item is complete.
- II.K.3.1 Automatic PORV Isolation
The District will demonstrate in the submittal required by Item II.K.3.2 that this modification is not necessary. We may wish to pursue this change, however, as an overall plant improvement which will allow a return to the original reactor pressure trip and PORV opening setpoints, together with an elimination of a reactor trip upon a turbine trip. Designs for such a modification will be submitted in time for NRC review prior to implementation.
- II.K.3.2 Report on PORV Failures
The District will make a submittal on this item by January 16, 1981.
- II.K.3.3 Reporting Safety Valve and Relief Valve Failures and Challenges
The District will make a submittal on this item by January 16, 1981.
- II.K.3.5 Automatic Trip of Reactor Coolant Pumps
As a member of the B&W Owners Group, the District is sponsoring a prediction of the LOFT L3-6 test. The prediction has been submitted to the NRC and the results will hopefully show that an automatic trip of the reactor coolant pumps is not necessary. We therefore do not commit to this item at this time.

- II.K.3.7 Evaluation of PORV Opening Probability
 The District will make a submittal on this item by January 16, 1981.
- II.K.3.17 ECC System Outages
 The District will make a submittal on this item by January 16, 1981.
- II.K.3.30 Small Break LOCA Methods
 By letter dated November 18, 1980, the District requested a meeting with the NRC staff to discuss the scope and schedule of this work. A meeting has been scheduled for December 16, 1980, following which a detailed scope and schedule will be submitted. The District is unable to commit at this time to the dates specified for this item until further understanding of this subject is obtained at the December 16, 1980 meeting.
- II.K.3.31 Compliance with 10CFR50.46
 Please see Item II.K.3.30.
- II.K.3.40 Reactor Coolant Pump Seal Damage
 This item is complete.
- II.K.3.43 Effects of Slug Flow
 This item is complete.
- III.A.1.1 Short Term Improvement to Emergency Preparedness
 This item is complete.
- III.A.1.2 Upgrade Emergency Support Facilities
 The interim upgrade is complete and the design and modifications will be committed to when the additional clarification is provided.
- III.A.2.1 Upgrade Emergency Plans to 10CFR50, Appendix E
 This item will be implemented as described in NUREG-0737 by April 1, 1981.
- III.A.2.2 Meteorological Data
 This item will be implemented by June 1, 1983.

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III.D.1.1.1 Primary Coolant Leak Reduction Outside Containment

This item is complete.

III.D.1.1.2 Technical Specifications

This Technical Specification change has not been proposed since a July 2, 1980 letter from Darrell G. Eisenhut indicating that a license condition will be issued related to system integrity.

III.D.3.3.1 & 2 In Plant Radiation Monitoring

This item has been completed.

III.D.3.4.1 Control Room Habitability Review

A submittal will be made on this item by January 16, 1981.

III.D.3.4.2 Modifications

The District intends to have all modifications completed by the requested date of January 1, 1983.

In the above listing, the District committed to implement several items in an outage scheduled to begin on April 1, 1982, instead of by the requested July 1, 1981 or January 1, 1982 dates. The July date coincides with the period of peak electrical demand in Northern California. We do not feel it is advisable to remove Rancho Seco Unit No. 1 from service at this time, considering the extremely small reserve margins available. Design efforts and equipment delivery schedules do not permit these modifications to be made prior to this time. In fact, these schedules indicate January 1, 1982 as the earliest possible date for implementation. The District is constructing a Nuclear Service Electrical Building at Rancho Seco to house equipment for these modifications. We presently expect construction to be completed late in 1981, at which time equipment installation may begin. Since considerable installation and cable pulling can occur before it is necessary to actually shut the unit down, we propose a scheduled date of April 1, 1982 to begin an outage during which final terminations and full implementation of these items can be made.

In addition, we are attempting to include the environmental qualification requirements identified in NUREG-0588 in the equipment being purchased for the TMI modifications. We expect these requirements to delay delivery beyond dates we would normally expect. The extent of these delays is unknown at this time, and we feel a three month extension beyond the requested January 1, 1982 date has no significant effect on the health and safety of the public. We feel the quality to be gained by this slight delay far outweighs any benefit from an earlier implementation.