



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

November 19, 1980



Mr. R. H. Engelken, Director  
Region V Office of Inspection & Enforcement  
U. S. Nuclear Regulatory Commission  
1990 North California Boulevard  
Walnut Creek Plaza, Suite 202  
Walnut Creek, California 94936

Re: J. L. Crews to J. J. Mattimce  
Letter Dated November 7, 1980  
Operating License DPR-54  
Docket No. 50-312

Dear Mr. Engelken:

In reply to your letter from Mr. J. L. Crews requesting an additional response to Item C of the Notice of Violation dated September 26, 1980, we offer the following explanations and corrective actions to assure full compliance with NRC requirements.

Appendix A, Item C of the September 26, 1980 letter notes the following infraction:

10 CFR Part 50, Appendix A, Criterion 23 states that the protection system shall be designed to fail into a safe state or into a state demonstrated to be acceptable on some other defined basis if conditions such as disconnection of the system, loss of energy (e.g., electric power, instrument air), or postulated adverse environments (e.g. extreme heat or cold, fire, pressure, steam, water, and radiation) are experienced.

In the FSAR Appendix 1A, Page 1A-26 as part of a discussion on Criterion 23, the licensee states, "Safety features equipment can be manually initiated by the operator at any time even if power is lost to the actuation system."

Contrary to the above the reactor building purge inlet line valve SFV 53503, the reactor building purge outlet line valve SFV 53604, and the reactor building pressure equalizing line valve SFV 53210 will apparently fail open on loss of direct current power to the solenoid operators.

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SMUD Reply

As stated above, the three valves do presently fail in the open position on a loss of direct current power to the controlling solenoid valves. Since the valves in question are all outside containment valves with a fully redundant inside containment motor-operated valve, containment integrity would not be violated upon loss of direct current power to the solenoid. However, to further assure containment integrity, it was decided to isolate the air to the three valves in question whenever reactor building containment integrity is required. Basically, this "fails" the valves in their respective safety features positions and subsequent loss of direct current power to the solenoid operators will not alter the position of the valve.

The above corrective action has been implemented as an interim solution. District engineers have designed a modification to the system which will provide a closure signal on loss of direct current power. Upon completion of this modification, the valves in question will fully meet all the requirements of 10 CFR Part 50, Appendix A, Criterion 23. It is the District's intention to make these modifications during the 1981 refueling outage.

Sincerely,

  
Wm. C. Walbridge  
General Manager

WCW:HH: jr