

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

March 13, 1981



Mr. R. H. Engelken, Director
Region V Office of Inspection & Enforcement
1990 North California Boulevard
Walnut Creek Plaza, Suite 202
Walnut Creek, CA 94596

Re: Operating License DPR-54
Docket No. 50-312
NRC Inspection (81-01)

Dear Mr. Engelken:

In reply to the inspection conducted by Mr. G. Zwetzig of your office on January 12 through 15 1981, we offer the following explanations and corrective action to assure full compliance with NRC requirements.

Appendix "A" of your letter notes the following violation.

Section 6.8.1 of the Rancho Seco Technical Specifications states, in part:

"Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972."

Section 1.1 of Appendix "A" of Regulatory Guide 1.33 (Safety Guide 33), November 1972 states in part, "Maintenance which can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures, documented instructions or drawings appropriate to the circumstances."

Section 6.8.2 of the Rancho Seco Technical Specifications states, in part:

"Each procedure..of 6.8.1 above, and changes thereto shall be reviewed by the PRC. Those matters pertaining to items 6.8.1 a, b and c, above shall be approved by the Plant Superintendent prior to implementation..."

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March 13, 1981

Contrary to the above, on February 2, 1980, a defective seal on the "A" Decay Heat Pump was replaced (Work Request No. 44953) without the use of a written procedure that had been reviewed by the PRC and approved by the Plant Superintendent.

District Reply

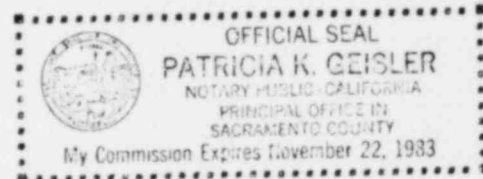
A written procedure will be prepared to replace the decay heat pump seals. The procedure will be reviewed by the PRC and approved by the Plant Superintendent as specified in the Technical Specifications. Rancho Seco will be in full compliance with this requirement prior to doing any future work on a decay heat pump seal.

W. S. Bossenmaier
W. S. Bossenmaier
Acting General Manager

Sworn to and subscribed before me
this 13th day of March, 1981.

Patricia K. Geisler

Notary Public



Appendix "B" of your letter notes the following deviation.

Section 5.1.6.2 of ANSI standard N18.7-1972, "Administrative Controls for Nuclear Power Plants," to which you are committed by letter dated September 23, 1976 states, in part:

"A preventative maintenance schedule should be established and maintained which describes the frequency and type of maintenance to be performed."

Contrary to the above, in the area of preventative maintenance the schedule was not being maintained in that approximately 100% of the safety-related mechanical items and 20% of the safety-related electrical items listed for maintenance during January 1981 were overdue by 30 days or more. Further, there were no written procedures for conducting the specified preventive maintenance on mechanical components.

District Reply

The Rancho Seco preventive maintenance history schedule is maintained on computerized printouts. The printouts are received by maintenance personnel monthly and are updated and sent to the District's data processing unit to be entered into the computer. At the beginning of each month a "late list" is printed by the computer showing those items which are overdue. This "late list" is not completely accurate since the work performed during the last week of the previous month and the first few days of the current month usually has not been entered into the computer at the time the list is printed. The inspection findings were based on review of "late lists" for the months of November and December.

The December completed preventive maintenance list had been sent to data processing to be entered into the computer and was not available on site during the inspection. Additionally, the November completed preventative maintenance list inadvertently had not been entered into the computer. The combination of the last two months completed preventative maintenance data not having been entered into the computer at the time of the inspection resulted in erroneous data concerning the currency of the safety-related preventative maintenance.

Contrary to the inspection findings, very few, if any, safety-related mechanical items were overdue by 30 days or more. Approximately 20% of the electrical items were, in fact, overdue by 30 days. However, due to the Cycle 5 refueling outage having been rescheduled to February, some of the items were deferred until that time. A certain amount of flexibility in a schedule is necessary. Even Technical Specifications Section 4.0 allows a + 25% flexibility for surveillance tests. To place tighter restrictions on a preventive maintenance schedule than on safety-related testing seems unwarranted.

Nonetheless, to assure full compliance with NRC requirements, the District will commit to having all safety-related preventive maintenance items current prior to returning to power operation following the current refueling outage.

Respectfully submitted,

W. S. Bossenmaier
W. S. Bossenmaier
Acting General Manager