

APPENDIX A

NOTICE OF VIOLATION

Rancho Seco Nuclear Generating Station
Sacramento Municipal Utility District
14440 Twin Cities Road
Herald, California 95638-9799

Docket No. 50-312
License No. DPR-54

During an NRC inspection conducted on September 9 through October 20, 1989, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR Part 50.59 and Rancho Seco Administrative Procedure RSAP-0303, Plant Modifications, require in part that a written safety evaluation be performed for changes to a facility as described in the safety analysis report.

Contrary to the above, the auxiliary fuel handling bridge which is described in the licensee's safety analysis report, was dismantled and removed from the reactor building in October, 1989, under Work Request No. 01650150-0. This facility change was not controlled under RSAP-0303 and, as a result, no written safety evaluation was performed.

This is a Severity Level IV violation (Supplement 1).

- B. Technical Specification 6.8.1 requires in part that procedures referenced in Appendix "A" of Safety Guide 33, November 1972, be established and implemented.

Safety Guide 33, Appendix "A", paragraph I.5, references procedures for the control of maintenance and modification work.

Rancho Seco Administrative Procedure, RSAP-0803, R.5, Paragraph 5.5.14, states, in part:

"The work request shall be changed to reflect the work required to be performed..."

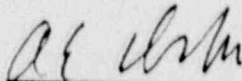
Contrary to the above, in October, 1989, Work Request No. #01650150-0 was not changed to temporarily relocate the auxiliary fuel handling bridge from the fuel transfer canal to the 60 ft. level of the reactor building. The work request only directed the equipment to be dismantled and removed from the reactor building. The increase in the scope of the work activity required to be performed was not prescribed by a change to the work request.

This is a Severity Level IV violation (Supplement 1).

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Pursuant to the provisions of 10 CFR 2.201, the Sacramento Municipal Utility District is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the NRC Resident Inspector, Anthony D'Angelo, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION



A. E. Chaffee, Deputy Director
Division of Reactor Safety and
Projects

Dated at Walnut Creek, California
this 7 day of December 1989