



SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, P.O. Box 15830, Sacramento CA 95852-1830, (916) 452-3211
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

AGM/NUC 89-285

December 28, 1989

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Docket No. 50-312
Rancho Seco Nuclear Generating Station
License No. DPR-54
MODIFICATIONS OF THE RANCHO SECO PHYSICAL SECURITY PLAN, OPERATOR TRAINING PROGRAM, AND EMERGENCY PLAN

Attention: George Knighton

As discussed in our meeting with the NRC on October 11, 1989, and in Dr. Murley's letter of November 27, 1989, the District submits the attached changes to the Rancho Seco Physical Security Plan, Operator Training Program, and Emergency Plan. These changes are based on the present defueled condition of the Plant. These modifications to the Security Plan and Emergency Plan, and the requested exemptions from 10 CFR 55 for the Training Program are not irreversible steps toward decommissioning and do not place any plant system in a degraded condition. An Executive Summary describing the rationale for the changes in the Physical Security Plan, Operator Training Program, and the Emergency Plan is also provided. The contents of the submittal are listed in the attached Table of Contents.

The District has revised the Physical Security Plan in accordance with the requirements of 10 CFR 50.54(p) and site procedures which govern changes to this Plan. Review of the modified Physical Security Plan determined that the changes do not decrease the safeguards effectiveness and do not involve an unreviewed safety question in accordance with 10 CFR 50.59. The revised Security Plan is Amendment 17 and implementation will begin on January 1, 1990. The Security Plan includes Safeguards Information and is therefore being provided under separate cover in accordance with 10 CFR 73.21.

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	<u>ADD</u>	<u>LTR</u>	<u>ENCL</u>
AEDO/DOA/IRB	1		1
NRR/DREP/PEPB	1		1
AEDO/DSP/TPAB	1		1
NRR/DRIS/R5GB	1		1
ACRS	1		1
REGION 5 FILE	1		1

The District is proposing modifications to the Training Program for Reactor Operators and Senior Reactor Operators that require exemptions from certain requirements of 10 CFR 55. The requested exemptions are identified in Attachment A. Formal review of the modified Training Program in accordance with 10 CFR 50.59 determined that the changes do not involve an unreviewed safety question. Although the changes to the Training Program result in reductions in scope and content from the present program, it is the District's determination that the changes are consistent with the operator training required with the Plant in a defueled condition and do not affect nuclear safety. The revised training programs are described in Attachments B and C. Pursuant to 10 CFR 50.54(i-1) and 10 CFR 55 the District will not implement affected changes to the Training Program prior to NRC approval.

The District is proposing changes to the Emergency Plan in accordance with site procedures which govern changes to the Plan. Formal review of the revised Emergency Plan in accordance with 10 CFR 50.54(q) and 10 CFR 50.59 resulted in the determination that certain changes required NRC approval prior to implementation. The District has concluded that the changes are consistent with the types of accidents and emergencies that can occur at the defueled Plant. Those changes not requiring NRC approval are anticipated to be implemented during the first quarter of 1990 upon completion of the required administrative procedures and training. An analysis of the revision is included as Attachment D and the revised Emergency Plan is provided as Attachment E.

We request that you review those Emergency Plan changes requiring NRC approval and the Training Program for the requested exemptions from 10 CFR 55. We are available as needed to support the Staff review and request a meeting with you and your staff in early January to discuss the submittal. Mr. Steve Crunk, our Licensing Manager, will contact Mr. George Kalman to establish a mutually convenient time for the meeting. We would hope that both yourself and Dr. Murley would be able to attend.

Members of your staff with questions requiring additional information or clarification may contact Mr. Steve Crunk at (209) 333-2935, extension 4913.

Sincerely,



Dan R. Keuter
Assistant General Manager
Nuclear

Attachment

cc w/atch: J. B. Martin, NRC, Walnut Creek
A. D'Angelo, NRC, Rancho Seco

State of California

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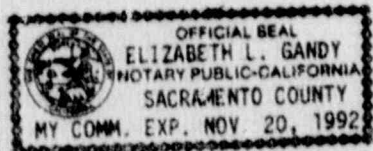
County of Sacramento

Dan R. Keuter, being first duly sworn, deposes and says: that he is Assistant General Manager, Nuclear of Sacramento Municipal Utility District (SMUD), the licensee herein; that he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute this document on behalf of said licensee.



Dan R. Keuter
Assistant General Manager
Nuclear

Subscribed and affirmed to before me on this 28th day of December, 1989.



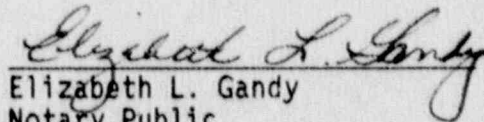

Elizabeth L. Gandy
Notary Public

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Amendment 17 - Revised Physical Security Plan

Appendix A - Description

Appendix B - Reason for Change

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Attachment B - Defueled Requalification Training Program for NRC Licensed Operators

Attachment C - Defueled Training Programs for NRC License Candidates

Emergency Plan

Attachment D - Analysis of Changes to Rancho Seco Emergency Plan

Attachment E - Revised Rancho Seco Emergency Plan