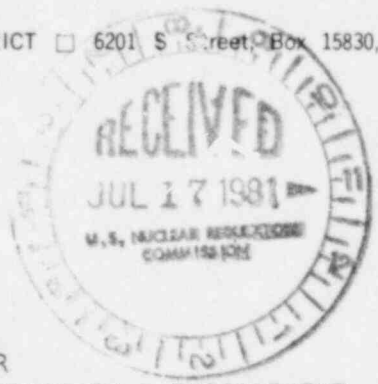




SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, Box 15830, Sacramento, California 95813; (916) 452-3211

July 1, 1981



R H ENGELKEN, DIRECTOR  
REGION V OFFICE OF INSPECTION & ENFORCEMENT  
U S NUCLEAR REGULATORY COMMISSION  
1990 N CALIFORNIA BLVD  
WALNUT CREEK PLAZA SUITE 202  
WALNUT CREEK CA 94596

OPERATING LICENSE DPR-54  
DOCKET NO. 50-312  
NRC INSPECTION 81-15

In reply to the inspection conducted by Mr. H. Canter and Mr. J. O'Brien of your office on April 1 through 30, 1981, we offer the following explanations and corrective steps which will be taken to avoid further items of non-compliance.

Appendix 'A' of the June 8, 1981 Notice of Violation notes the following:

10 CFR 50.55a(g)(1) states, in part, "For a boiling or pressurized water-cooled nuclear power facility whose construction permit was issued prior to January 1, 1971, components...shall meet the requirements of Paragraphs (g)(4) and (g)(5) of this section to the extent practical." (Note: The construction permit for Rancho Seco was issued on October 11, 1968).

10 CFR 50.55(g)(4) states, in part, "Throughout the service life of a boiling or pressurized water-cooled nuclear power facility, components which are classified as ASME Code Class 1, Class 2, and Class 3, shall meet the requirements...set forth in Section XI of (applicable) editions of the ASME Boiler and Pressure Vessel Code..."

By letter dated May 30, 1978, the Commission issued Amendment No. 20 to the facility license, making the above provisions effective October 18, 1979.

By letter dated October 17, 1979, the NRC issued a letter stating, in part: "During the period between the date that the requirements of 10 CFR 50.55a(g) become effective for your facility and the date we complete our detailed review of your submittal you must comply with both your existing

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Technical Specifications and your proposed inservice inspection and testing program. In the event conflicting requirements arise for some components, you must comply with the more restrictive requirements (e.g., shorter inspection intervals, increased number of parameters measured)..."

The licensee's proposed inservice inspection and testing program is described in his letters to the NRC dated December 24, 1979, and April 17 and May 30, 1980. This program defines the components that are to be tested, the measurements that are to be made and the relief that has been requested from certain requirements of ASME Section XI. Among the pumps to be tested are the High Pressure Injection and Makeup Pump. One of the parameters to be measured is bearing temperature. No relief was requested from this requirement.

ASME Section XI, Subsection IWP-3500(b) states: "When measurement of bearing temperature is required, each pump shall be run until the bearing temperatures (IWP-4310) stabilize, and then the quantities specified shall be measured or observed and recorded. A bearing temperature shall be considered stable when three successive readings taken at 10 min. intervals do not vary by more than 3%."

ASME Section XI, Subsection IWP-1100 states in part, "This Subsection provides the rules and requirements for inservice testing of Class 1, 2, and 3...pumps that are...required to perform a specific function in shutting down a reactor or in mitigating the consequences of an accident and are provided with an emergency power source..."

Contrary to the above, the licensee's approved procedures for testing these pumps (SP 203.02A/B/C, Quarterly HPI System Surveillances) do not provide for achieving stabilizing bearing temperatures. Instead, the procedures allow operation for as little as 15 minutes and require only one measurement of bearing temperature. In addition, the procedure does not measure the capability of the pumps to operate following an accident which also includes a loss of offsite electrical power.

A review of the results of the surveillances performed between October 18, 1979, and April 3, 1981, by the Resident Inspector indicate that the above procedures were conducted as written and no supplemental measurements were recorded indicating achievement of stabilized bearing temperatures or capability to operate satisfactorily with only the safety-related lube oil cooler in operation.

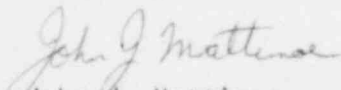
As a result of the above, a degraded condition of the High Pressure Injection and Makeup pumps safety-related lube oil coolers was not detected by the surveillance procedures.

#### DISTRICT REPLY

The Inservice Inspection and Testing Program for the High Pressure Injection and Makeup pumps utilizes a surveillance procedure established in June 1974. This procedure permits accepting the performance of the functional test after a 15 minute duration, in agreement with Technical Specification Section 4.5.1.2.D.1. It was pointed out that this duration will not permit one of the six pump parameters required by ASME Section XI, Table IWP-3100-a, to be measured. This parameter, bearing temperature, is considered to be least critical as evidenced by the exception to test frequency stated in IWP-3300 of the Code, "...which shall be measured during at least one inservice test each year."

To eliminate this discrepancy, the surveillance procedures for the High Pressure Injection and Makeup pumps will be revised to comply with the requirements of IWP-3500. Further, the Decay Heat Removal, Spent Fuel Cooling, Reactor Building Spray, Auxiliary Feedwater, Nuclear Service Cooling Water, and Boric Acid Pumps will be tested in accordance with IWP-3500. This will be accomplished by September 30, 1981, to maintain full compliance with the ASME Section XI Code. The Nuclear Service Raw Water pumps are exempt from bearing temperature measurement since all are within the main flow path.

The High Pressure Injection and Makeup pumps need not be tested with only the Nuclear Service raw water supplying cooling to the lube oil coolers. The performance test conducted for LER 81-16 assured proper operation of the HPI system independent of lube oil coolers, and the additional valve lineups and realignment are not prudent from an operational standpoint. The performance of these lube oil coolers has been covered in our March 30 and May 5, 1981 letters to your office.



John J. Mattimoe  
Assistant General Manager  
and Chief Engineer

Sworn to and subscribed before me  
this 22 day of July, 1981.



Notary Public

