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*NOT ADMITTED IN D.C.

January 17, 1983

WRITER'S DIRECT DIAL NUMBER
822-1090

Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Order for Modification of License
(47 Fed. Reg. 57166): Sacramento
Municipal Utility District (Rancho
Seco Nuclear Generating Station)
Docket No. 50-312

Dear Sir:

On December 22, 1982, the Nuclear Regulatory Commission published in the Federal Register an Order for Modification of License concerning the Rancho Seco Nuclear Generating Station. The Order provided that licensee Sacramento Municipal Utility District may request a hearing with respect to the Order within 25 days of the date of its publication in the Federal Register (i.e., by January 17, 1983).

The Order would require that Licensee install an inadequate core cooling instrumentation system consisting of subcooling margin monitors, core-exit thermocouples and a reactor coolant inventory tracking system, all of which conform to the design parameters specified in NUREG-0737 Item II.F.2. The Order also establishes timing requirements for the design, installation and operation of this system.

The Rancho Seco Nuclear Generating Station already includes subcooling margin monitors and core exit thermocouples. It will also have a reactor coolant inventory tracking system.

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Director, Office of Nuclear Reactor Regulation
January 17, 1983
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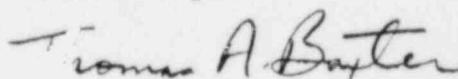
This system will include a wide range hot leg level monitor to provide inventory tracking when reactor coolant pumps are not in operation. To provide inventory tracking when reactor coolant pumps are on, Licensee will commit to install a reactor coolant pump monitor.

Although the Rancho Seco facility will have a reactor coolant inventory tracking system, that system will not include a reactor vessel head level monitor. While such a monitor is not explicitly required by Section III of the Order, Section II of the Order states that differential pressure measurement techniques for reactor coolant inventory tracking are acceptable if they monitor the inventory over the range from the vessel upper head to the bottom of the hot leg as a minimum. The Rancho Seco system will not meet this criterion. Because of the B&W once through steam generator design, a reactor vessel head monitor is neither required nor useful at Rancho Seco.

Licensee is sponsoring further analysis to confirm that a reactor vessel head monitor is not needed at Rancho Seco. Licensee will submit the results of this analysis to the NRC for its review by April 15, 1983. Licensee believes that it would be appropriate to await completion of this further analysis and the NRC's review before determining whether a hearing should be requested. If the NRC Staff upon completion of its review takes the position that a reactor vessel head monitor is still required for Rancho Seco, Licensee respectfully requests an extension of time within which to request a hearing until 30 days after notification by the NRC Staff of that position.

The Office of Executive Legal Director has indicated that it does not object to the requested extension. If this request for extension is not granted, Licensee hereby requests a hearing on the Order.

Sincerely,



Thomas A. Baxter
Counsel for Licensee Sacramento
Municipal Utility District

cc: Docketing and Service Section, Office of the Secretary
Office of Executive Legal Director