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

May 5, 1982

RICHARD C DE YOUNG DIRECTOR
OFFICE OF INSPECTION AND ENFORCEMENT
U S NUCLEAR REGULATORY COMMISSION
WASHINGTON D C 20555

DOCKET NO 50-312
RANCHO SECO NUCLEAR GENERATING STATION
UNIT NO 1
PROMPT NOTIFICATION SYSTEM
RESPONSE TO NOTICE OF VIOLATION EA 82-37

REFERENCES: 10 CFR 50 Appendix E Section IV.D.3
District letter of June 30, 1981
District letter of July 24, 1981
Federal Register Vol. 46, No. 182 p46587
NRC Region V letter of October 20, 1981
District letter of December 31, 1981
NRC Region V letter of January 21, 1982
Notice of Violation, February 12, 1982
District letter of February 12, 1982
District letter of March 3, 1982
District letter of March 18, 1982
District letter of April 1, 1982
District letter of April 19, 1982
District letter of April 27, 1982

This letter is in response to the Notice of Violation included with your February 12, 1982 letter. The Notice of Violation states, in part:

> 10 CFR 50.54(s) and Appendix E to 10 CFR Part 50 (46 FR 63032, December 30, 1981) require each nuclear power reactor licensee, by February 1, 1982, to demonstrate that administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway emergency planning zone.
>
> Contrary to the above, by letter dated December 31, 1981, the licensee notified the NRC that it would not be able to demonstrate by February 1, 1982 that administrative and physical means had been established for alerting and promptly providing public instruction within the plume exposure pathway emergency planning zone for the Rancho Seco Nuclear Generating Station.
>
> This is a Severity Level III violation (Supplement 1).

IE-14

District's Response

As of Friday, April 30, 1982, we completed the installation of our Prompt Notification System. Initial testing was performed prior to and during equipment installation.

After system activation, control deficiencies were discovered. We experienced two false operations of sirens. Our siren manufacturer is investigating the cause and will be taking corrective actions as soon as the problem is resolved. Due to the possibility of other misoperations, we elected to disconnect all sirens until the deficiencies are corrected. We believe, however, that the system was essentially complete on April 30, 1982, and are hereby notifying you of this completion date.

In your February 12, 1982 letter, you mentioned a number of considerations that will be applied to the decision on the amount of civil penalties to be imposed. The first related to how well you were kept informed on our activities. We do not believe there is any doubt on that issue. Please see the list of references. District letters were provided, addressing implementation schedules or status of the system during all stages of the project, from conceptual design through installation.

The second consideration was on the compensatory measures in effect, the percentage of system completion, and the degree of effort. During the period we were not in compliance, the County of Sacramento made available two (2) Sheriff's Department helicopters, equipped with loudspeakers, for use should an alert be necessary. An additional helicopter was also available through the California Highway Patrol. The County of Sacramento also planned on utilizing a number of Sheriff's Department patrol cars, equipped with loudspeakers. Our degree of completion and effort is apparent in the subsequent information.

Unique problems and diligence were final items for consideration. Because of the necessity to work with the counties, into which the alerting system was to be installed, we experienced delays simply due to the time necessary to get agreement between parties having different interests and priorities. Many meetings were held between the counties, the District, and our consultants to resolve the conceptual design of the system. A conceptual design was finally agreed to in late May, 1981. Our consultant was then given direction to prepare specifications for a siren system and to concurrently give us a recommended layout for the sirens. The counties were asked to comment on the specifications and the layout. They had a significant number of comments on the siren layout. By early August, their comments were incorporated and we had what everyone felt was an acceptable layout. This delay impacted the release of the siren specification for bidding purposes, since the layout was needed to determine the number of sirens, the level of their acoustical output, and the siren operating voltage, which is dependent on the availability of nearby power. Even though this information was not all available, we released the specification for bidding purposes on September 14, 1981, intending to modify our needs by contract changes as the design progressed.

The District's purchasing policy requires a formal bidding period and an award to the lowest responsible bidder meeting our requirements. This process takes a minimum of six to seven weeks under the best of circumstances. Two bids were

received. Unfortunately, neither met our requirements. This necessitated a rebid. We received an acceptable bid on the rebid. A siren contract was awarded on December 17, 1981. The rebid essentially doubled the time to get a siren contractor. Fourteen weeks elapsed, from issuing the first bid request to awarding an equipment contract.

Our siren supplier, Alerting Communicators of America, had a commitment to supply all equipment by March 25, 1982. He experienced a number of manufacturing problems, which extended delivery of the final pieces of equipment to April 21, 1982. Among the problems he had were the following:

1. Late delivery of control equipment (receivers, encoders, decoders, etc.) from his subcontractors.

2. Paint peeling, which required refinishing some equipment and changing the paint supplier.

3. Dimensional tolerances on siren rotors were exceeded, which required remachining the rotors.

4. Motor overheating was found during factory testing, which required extensive motor modifications on all sirens.

5. Incorrect operation of siren controls, which required redesign of electrical circuits.

These problems extended delivery completion by about four weeks.

Recognizing the need to expedite the installation of this system, the District undertook a number of exceptional measures.

1. We made drawing approvals at the siren manufacturer's factory to improve drawing approval time.

2. We arranged to have all equipment airfreighted to us.

3. We arranged for partial shipments of equipment to allow us to install equipment as soon as possible. We received our first partial delivery on March 15th and they extended through April 21st.

4. We had almost daily contact with the siren manufacturer, following his manufacturing process and encouraging him to expedite delivery.

5. We had District crews working overtime to install the equipment as it arrived.

6. We encouraged and were successful in getting the vendor to work overtime to improve his performance.

7. We had county-contracted installers working overtime to install activation equipment.

8. We approved the expenses to the District for interim equipment configurations, both at siren sites and at county EOCs. For instance, we will be required to change activation frequency for San Joaquin County, which will require modifications at the siren sites. Also, county activation equipment will have to be relocated to permanent configurations later on, at our expense.

9. Siren poles were all installed prior to equipment arrival. Equipment was tested and installed as it came in. This was not very efficient use of time or manpower, but it did succeed in having an installed system within days of delivery of the final equipment.

In summary, delays were caused by:

1. The inability to reach expeditious agreement on a design effectively delayed our equipment purchase.

2. District procurement policies, which normally would add six to seven weeks to a purchase, but with the rebid, added fourteen weeks.

3. Manufacturing problems, which added approximately four weeks.

Not including design related delays, we had at least eleven identifiable weeks of delay beyond our control.

Given the above information, the District does not believe it should be subjected to any civil penalties.

John J. Mattimoe

John J. Mattimoe
Assistant General Manager
and Chief Engineer

cc: R. H. Engelken, Director
Region V, Office of Inspection
and Enforcement

Sworn to and subscribed before me this 24th day of August, 1982.

Mary Alice Bay
Notary Public

MARY ALICE BAY
NOTARY PUBLIC-CALIFORNIA
PRINCIPAL OFFICE IN
SACRAMENTO COUNTY
My Commission Expires January 29, 1985