

DECEMBER 15 1982

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Docket No. 50-312

Mr. J. J. Mattimoe  
 Assistant General Manager and  
 Chief Engineer  
 Sacramento Municipal Utility  
 District  
 6201 S Street  
 P. O. Box 15830  
 Sacramento, California 95813

Dear Mr. Mattimoe:

SUBJECT: RANCHO SECO - REQUEST FOR ADDITIONAL INFORMATION ON  
 INSERVICE TESTING PROGRAM RELIEF REQUEST

From our review of your submittals regarding the Rancho Inservice  
 Testing Program (IST) dated July 18, 1979, December 24, 1979 and  
 May 30, 1980, we find that we require additional information. The  
 information required is outlined in the enclosure.

Please provide the required information within 45 days of receipt  
 of this letter.

The reporting and/or recordkeeping requirements contained in  
 this letter affects fewer than ten respondents; therefore, OMB  
 clearance is not required under P. L. 96-511.

Sincerely,

APPROVED AND SIGNED BY  
 JOHN F. STOLZ

John F. Stolz, Chief  
 Operating Reactors Branch #4  
 Division of Licensing

Enclosure:  
 Request for Additional  
 Information

cc w/enclosure:  
 See next page

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 PDR ADOCK 05000312  
 P PDR

OFFICE	ORB#4:DL	C-ORB#4:DL	ORB#1:DL				
SURNAME	SMiner;cf	JStolz	PTam				
DATE	12/17/82	12/15/82	12/15/82				

Sacramento Municipal Utility  
District

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Rancho Seco, Docket No. 50-312

cc w/enclosure(s):

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Sacramento, California 95813

Sacramento County  
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Docketing and Service Section  
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U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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Elizabeth S. Bowers, Esq.  
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Washington, D. C. 20555

Sacramento Municipal Utility  
District

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Atomic Safety and Licensing Appeal  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Mr. Robert H. Engelken, Regional Administrator  
U. S. Nuclear Regulatory Commission, Region V  
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Walnut Creek, California 94596

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Atomic Safety and Licensing  
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Washington, D. C. 20555

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California Department of Health  
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Radiation Control Unit  
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714 P Street, Room 498  
Sacramento, California 95814



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION V

1450 MARIA LANE, SUITE 260  
WALNUT CREEK, CALIFORNIA 94596

Request for Additional Information  
Inservice Testing Program Relief Requests  
Rancho Seco Nuclear Generating Station  
Docket No. 50-312

Note: The following questions are keyed to the IST program submitted July 18, 1979 as revised December 24, 1979 and May 30, 1980.

1. PV 30, 31, 32, 33, 35, 36 and 37: These items request relief from the stroke tests required by Section IWV-3410 (a) and (b) on the basis that these are manual, locked closed, passive class A/E valves which are not required to change position to fulfill their safety function. This appears to meet the code requirements for this valve class provided operational checks, with appropriate record entries, are performed as required by IWV-3700. Accordingly, please modify your requests for relief to indicate that the operational checks of Section IWV-3700 Inservice Tests, Category E valves, will be performed.
2. PV 34: This item requests relief from stroking two manual, passive, closed containment isolation valves. As indicated in question 1, IWV-3700 permits relief from stroking Category E valves; however, your submittal does not classify these valves as Category E. Further, since they are not locked or sealed in position, they do not satisfy the definition of a Category E valve as given in IWV-2110(e). Accordingly, unless these valves satisfy the definition of Category E valves, or stroke testing is shown to be impractical, the requirements of IWV-3410 must be satisfied. Please address this matter.
3. PV 37: This request includes a Category C valve DMV025. Since this is not a Category E valve, please explain the basis for requesting relief from Section IWV-3520 check valve tests.
4. PV 38: The basis given for requesting relief from the Section XI leakage rate measurement is that the Category A containment isolation valves are currently tested under the provisions of Appendix J to 10 CFR 50. Although certain tests performed to Appendix J are acceptable for satisfying the requirements of Section XI, it is important that these tests reflect the intent of IWV-3420, Valve Leak Rate Test. Accordingly, please modify your request for relief to indicate that the Appendix J testing per SP205.01 and SP205.02 will provide individual valve leak rate tests, and that the analysis required by IWV-3420(f) and the corrective action

required by IWV-3420(g) will be performed. Where individual leak testing is considered impracticable, please (1) identify the specific valves where this applies, (2) the basis for this conclusion, (3) the alternate testing to be performed to provide an equivalent degree of assurance of leak-tightness and (4) any alternatives to the analysis and corrective actions specified in IWV-3420(f) and (g).

5. PV 41: The basis for relief as stated is: "All valves listed above are manual, closed, passive containment isolation valves..." Our review of the P&IDs in our possession indicates that seven of the nine valves are normally open. Please address this finding and revise your request as appropriate.
6. PV 9 Rev. 1, PV 11 Rev. 1, PV 12 Rev. 1 and PV 13 Rev. 1: These requests for relief appear to be based on the assumption that full-stroke testing can only be accomplished by flow testing. IWV-3520, however, specifies other methods for performing full stroke testing, including visual observation, electrical position indication, observation of pressure differences and use of a mechanical exerciser.  
  
Please consider these other techniques in determining if full stroke testing is impractical. If, after considering these other techniques, it is still concluded that full stroke testing of these valves is impractical, please explain the basis for your conclusions.
7. PV 23 Rev. 1: Please describe quantitatively how the flow rate versus spray header pressure curves will provide sufficient sensitivity to demonstrate that Q is within the acceptable range as defined by Table IWP-3100-2, Allowable Ranges of Test Quantities, or that corrective action, as defined in IWP-3230 is needed.
8. PV 24: Pumps which are operated on less than a monthly frequency are by Section IWP-3400 required to be tested monthly. Although, later editions of the code ( i.e., 1977, 1980) permit quarterly testing, they also require quarterly measurement of all of the test quantities of Table IWP-3100-1.

Since your request includes pumps P-236, P-238 A&B, P-318, P-319, P-472 A&B and P-482 A&B where the flow rate is calculated and not measured, these pumps should be tested monthly to verify operability. Conversely, where all of the requirements for quarterly testing are satisfied (including all required measurements are obtained with instruments of appropriate accuracy) quarterly testing will be approved.

9. PV 25: Because many of the presently installed and hand held instruments do not meet the requirements of Table IWP-4110-1, it appears the corrective actions of Section IWP-3230 would be compromised. Please explain how the requirements of IWP-3210, Allowable Ranges of Inservice Test Quantities, will be met and acceptable performance, per Table IWP-3100-2 will be demonstrated.