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

January 7, 1983

DIRECTOR OF NUCLEAR REACTOR REGULATION
ATTENTION JOHN F STOLZ CHIEF
OPERATING REACTORS BRANCH 4
US NUCLEAR REGULATORY COMMISSION
WASHINGTON D C 20555

DOCKET 50-312
RANCHO SECO NUCLEAR GENERATING STATION
UNIT NO 1
HPI NOZZLE INSPECTIONS

Your letter of January 5, 1983, requests the bases for the reasons cited in our December 14, 1982 filing with the Atomic Safety and Licensing Appeal Board, regarding inspection frequency for the unmodified HPI nozzles at Rancho Seco Unit No. 1. As stated in that filing, we do not feel there is a safety reason which warrants the once-per-cycle inspection proposed by the Appeal Board.

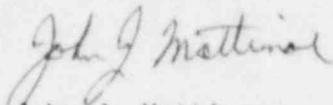
A Task Force was formed by the B&W Owners to study the loose thermal sleeve and nozzle cracking problems. This task force had a meeting with your staff on December 16, 1982, to present the status of their effort. The Task Force feels, and we agree, that there is no reason to expect a thermal sleeve to become loose which has remained tightly in position to date. We do feel, however, as does the Task Force, that an augmented, inservice inspection program is justified and have agreed with their preliminary conclusion of a once-in-every-five-cycle radiographic inspection. We feel this is a conservative schedule since, as stated in our filing, we feel that a loose or missing sleeve does not present a safety concern. The only through-wall cracking to occur as a result of a loose sleeve was at the Crystal River Three plant which had a unique configuration with a valve body welded directly to the nozzle safe-end. The Task Force has also made a preliminary recommendation for a once-per-cycle examination for the next five cycles before changing to the once-every-five-cycle frequency. We feel there are no unique operating parameters during the next five cycles to justify waiting until that time to change to the once-every-five-cycle frequency. We, therefore, feel the gradual change in frequency as discussed in our filing to be justified at this time. As also stated in our filing, these nozzles are not used for system makeup (a routine, continuous function), and have experienced over six years of plant operation to date.

I want to emphasize that the Task Force recommendation is preliminary and would not become an Owners' Group position until finalized and reviewed by

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each utility's management so that ALARA and cost considerations can be included in the decision. Since these considerations are not included in the Task Force effort, we feel that their preliminary findings are conservative; however, we agree with their once-every-five-cycle recommendation. This is why we commented on the Appeal Board's tentative conclusion of a once-per-cycle inspection frequency.



John J. Mattimoe
General Manager