



SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, P.O. Box 15830, Sacramento CA 95852-1830, (916) 452-3211
 AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

AGM\NUC 90-256

October 09, 1990

U.S. Nuclear Regulatory Commission
 Attn: Document Control Desk
 Washington, DC 20555

Docket No. 50-312
 Rancho Seco Nuclear Generation Station
 License No DPR-54

**RESPONSE TO GENERIC LETTERS 85-20, 89-10, 88-05, 88-20, 88-17,
 88-14, 88-11, 88-08, 89-18, AND 89-19**

Attention: Seymour Weiss

The District ceased reactor operations of Rancho Seco and completed defueling the reactor December 8, 1989. The District staff has reviewed the subject Generic Letters and, given the permanently shutdown condition of Rancho Seco, determined that the subject and content of those letters are not applicable and are deferred from further evaluation. Enclosure 1 provides the District's Status/Response to the subject Generic Letters.

Members of your staff with questions requiring additional information or clarification may contact Jerry Delezenski (209) 333-2935, extension 4914.

Sincerely,

Dan Keuter
 Assistant General Manager,
 Nuclear

Enclosure [1]

cc: J. B. Martin, NRC, Walnut Creek
 C. Myers, NRC, Rancho Seco
 S. Reynolds, NRC, Rockville, Md.
 H. Wong, NRC, Walnut Creek
 Document Control Desk, NRC, Washington, D. C.

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ENCLOSURE 1

DISTRICT'S STATUS/RESPONSE

Deferred/Not applicable for a defueled plant
Reactor Coolant System will be in wet layup and HPI is not required.

Deferred/Not applicable for a defueled plant
Procedure EM.117A regarding testing and surveillance of MOV's revised for the valves required for the plant defueled condition. Valves other than those required for Spent Fuel Pool Cool and systems required to be operable and available have been deferred/determined not applicable for a defueled plant.

Deferred/Not applicable for a defueled plant
In the defueled condition, there are only two credible accidents loss of off-site power and fuel handling accident. The requirements of GL 88-20 regarding component leakage during power operations in the reactor building is not a concern when the Reactor Coolant System is in wet layup and the reactor defueled.

Deferred/Not applicable for a defueled plant
In the defueled condition with the Reactor Coolant System in wet layup Boric Acid Corrosion of Carbon Steel RCS components is not applicable.

Deferred/Not applicable for a defueled plant
RCS will be in wet layup. Independent temperature indications with alarm capabilities and recording of temperature and level indications are not applicable.

Deferred/Not applicable for a defueled plant
Particulate contamination of IAS and development of a particulate monitoring system is not required in the defueled condition. IAS air quality has been evaluated and meets all requirements for a plant in the defueled condition.

Deferred/Not applicable for a defueled plant
Rancho Seco is permanently shutdown and completely defueled. There are no source terms affecting embrittlement of materials.

Deferred/Not applicable for a defueled plant
Rancho Seco is permanently shutdown and completely defueled. Systems are being layed up and will remain in a static condition until decommissioning activities commence.

Deferred/Not applicable for a defueled plant
Rancho Seco is permanently shutdown and completely defueled. The District does not intend to resume power operations, therefore, systems interaction are not a viable concern.

Deferred/Not applicable for a defueled plant
Rancho Seco is permanently shutdown and completely defueled. The District does not intend to resume power operations, therefore, Control Systems for power operations do not apply.

NRC GENERIC LETTER

Generic Letter 85-20 Resolution of Generic Issue 69: High Pressure injection/make-up nozzle cracking in B&W plants.

Generic Letter 89-10: Safety-related motor-operated valve testing and surveillance and IE Bulletin 85-03: Motor Operated Valve Common Mode Failures During Plant Transients Due to Improper Switch Settings

Generic Letter 88-20 and Supplement 1: Initiation of the Individual Plant Examination for Severe Accident Vulnerabilities-10 CFR 50.54(i)

Generic Letter 88-05: Boric Acid Corrosion of Carbon Steel Reactor Pressure Boundary Components in PWR Plants

Generic Letter 88-17: Loss of Decay Heat Removal

Generic Letter 88-14: Instrument Air Supply System Problems Affecting Safety-Related Equipment

Generic Letter 88-11: NRC Position on Radiation Embrittlement of Reactor Vessel Materials and Its Impact on Plant Operations

Generic Letter 89-08: Erosion/Corrosion-Induced Pipe Wall Thinning

Generic Letter 89-18: Systems Interactions in Nuclear Power Plants

Generic Letter: 89-19: Unresolved Safety Issue A-47 "Safety Implication of Control Systems in LWR Nuclear Power Plants" Pursuant to 10 CFR 50.54(f)