



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

AGM/NUC 90-284

December 04, 1990

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

Docket No. 50-312
Rancho Seco Nuclear Generating Station
License No. DPR-54
PROPOSED AMENDMENT NO. 182, REVISION 2

- Reference:
1. D. Keuter (SMUD) to G. Knighton (NRC) letter AGM/NUC 89-269, dated December 28, 1989, Proposed Amendment No. 182
 2. S. Reynolds (NRC) to D. Keuter (SMUD) letter dated April 24, 1990, Proposed Amendment 182, Defueled Technical Specifications (TAC No. 75620)
 3. D. Keuter (SMUD) to J. Larkins (NRC) letter AGM/NUC 90-130, dated April 30, 1990, Proposed Amendment No. 182, Revision 1

Attention: Seymour Weiss

In accordance with 10 CFR 50.90, the Sacramento Municipal Utility District (the District) proposes to amend operating license No. DPR-54 for Rancho Seco and revises Proposed Amendment No. 182 (PA-182). Based on discussions to resolve outstanding issues with NRC staff and the continuing District review of the Technical Specification requirements appropriate for the defueled condition, the District submits PA-182, Rev. 2. The original submittal of PA-182 was replaced in its entirety by PA-182, Revision 1, except for the Radiological Environmental Monitoring Program Manual and the Process Control Program which were included in PA-182 to support implementation of Generic Letter 89-01. PA-182, Rev. 2, replaces the previous submittals of PA-182 in their entirety. The Offsite Dose Calculation Manual, Process Control Program, and Radiological Environmental Monitoring Program are included in this submittal for completeness of the package and to meet the implementation requirements of Generic Letter 89-01.

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Proposed Amendment No. 182, Revision 2, adds the "Permanently Defueled Technical Specifications (PDS)" as Appendix C to the facility operating license. Proposed Amendment No. 182, Revision 2, accomplishes the following:

- seeks relief from 10 CFR Sections 55 and 50.49,
- deletes the Appendix B Technical Specifications,
- defines a new mode (the Permanently Defueled Mode), and
- specifies the Technical Specification requirements applicable in the Permanently Defueled Mode (PDM).

Attachment I is the proposed PDS which, upon approval, would become Appendix C to the facility operating license. While the plant is in the PDM, the District will comply with the Appendix C Technical Specifications in lieu of Appendix A. Movement of nuclear fuel into the Reactor Building, which is not allowed per a license condition without prior NRC approval, would take the plant out of the PDM and cause the Appendix A Technical Specifications to become applicable. Attachment I also contains the deletion instructions for Appendix B and the replacement page for Appendix B.

Attachment II contains the Safety Analysis and No Significant Hazards Consideration (the Safety Analysis Report) for PA-182, Revision 2. This revised Safety Analysis Report (SAR) represents an enhanced review of the accidents and conditions considered credible in the PDM. The revised SAR provides additional justification for the requirements included in the PDS and the Appendix A and Appendix B requirements not included in the PDS.

Attachment III is the Certified Fuel Handler (CFH) Training Programs which are provided for NRC review and approval. The evaluation of the CFH Training Programs and the training requirements included in the PDS is included in Attachment II (see the evaluation for Specifications 6.2.2, 6.4.1, and 6.8 on pages 38 through 43, 46, and 47 of the SAR). An exemption from the licensed operator requirements of 10 CFR 55 is requested.

Attachment IV is the draft Offsite Dose Calculation Manual (ODCM) and is provided for NRC use as a reference to support the implementation of Generic Letter 89-01. This ODCM is identical to the ODCM submitted previously with PA-182, Rev. 1. The ODCM is included in this submittal for completeness of the PDS package.

Attachment V depicts the Rancho Seco organization expected to be in effect when the PDS are approved. This projected 1991 nuclear organization is provided for information. The Rancho Seco organization is anticipated to evolve further as closure activities continue.

Attachment VI is the draft Process Control Program (PCP) and is provided for NRC use as a reference to support the implementation of Generic Letter 89-01. This PCP is identical to the PCP submitted previously with PA-182, Rev. 0. The PCP is included in this submittal for completeness of the PDTS package.

Attachment VII contains the justification for deleting the Appendix B Technical Specifications. Included in Attachment VII is a copy of the most recent submittal of the amendment requesting deletion of Appendix B (PA-102, Rev. 1). Also, a modified version of PA-102, Rev. 1, is provided which addresses the characteristics of Appendix C that justify deleting Appendix B. The deletion of Appendix B is independent of the approval of Appendix C. Both Appendix A and the proposed PDTS contain Technical Specification requirements sufficient to allow the deletion of Appendix B. For further evaluation, see page 52 of the SAR.

Attachment VIII is the draft Radiological Environmental Monitoring Program (REMP) Manual and is provided for NRC use as a reference to support the implementation of Generic Letter 89-01. This REMP Manual is an editorially modified version of the REMP Manual submitted with PA-182, Rev. 0. Attachment VIII consists of the latest, approved REMP Manual and the REMP associated Technical Specification requirements. Attachment VIII replaces the REMP Manual submitted previously. The location of the editorial changes are indicated by a line in the right margin of the REMP Manual.

Pursuant to 10 CFR 50.91(b)(1), the Radiological Health Branch of the California State Department of Health Services has been informed of this proposed amendment by mailed copy of this submittal.

It is requested that upon approval of this proposed amendment by the NRC, the PDTS be made effective no later than thirty days after receipt by the District.

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

State of California
County of Sacramento SS

Dan R. Keuter, being first duly sworn, deposes and says: that he is Assistant General Manager, Nuclear of Sacramento Municipal Utility District (SMUD), the licensee herein; that he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute this document on behalf of said licensee.



Dan R. Keuter
Assistant General Manager
Nuclear

Subscribed and affirmed to before me on this 4th day of December, 1990.



Anita Magures
Anita Magures
Notary Public

Attachments

cc w/atch: J. B. Martin, NRC, Walnut Creek
C. Myers, NRC, Rancho Seco
P. Szalinski, State of California
S. Reynolds, NRC, Rockville (2 copies)

SACRAMENTO MUNICIPAL UTILITY DISTRICT

RANCHO SECO UNIT 1

PERMANENTLY DEFUELED TECHNICAL SPECIFICATIONS

DOCKET NO. 50-312

Proposed Amendment No. 182, Revision 2

To Facility Operating License No. DPR-54

(Appendix C)

NOVEMBER 1990