



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 90-307

December 20, 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

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION - EXEMPTION REQUEST FROM  
CERTAIN REQUIREMENTS OF 10 CFR 50.47(b) AND 10 CFR 50, APPENDIX E

- References:
1. D. Keuter (SMUD) to S. Weiss (NRC) letter AGM/NUC 90-238, dated September 20, 1990, Exemptions from Certain Requirements of 10 CFR 50.47(b) and 10 CFR 50, Appendix E
  2. D. Crutchfield (NRC) to D. Keuter (SMUD) letter dated November 30, 1990, Issuance of exemption to 10 CFR 50.47 and 10 CFR 50, Appendix E (TAC No. 77229)
  3. D. Keuter (SMUD) to S. Weiss (NRC) letter, AGM/NUC 90-284, dated December 4, 1990, Proposed Amendment No. 182, Revision 2

Attention: Seymour Weiss

This letter provides the District's response to an NRC request for additional information concerning Reference 1. The request for additional information came during a telephone conversation with Mr. Jim Shetler of the Rancho Seco staff on December 14, 1990. Six specific requests for additional information resulted from the telephone conversation. Attachment I contains the District's response to the six items. Attachment II contains the Emergency Plan Change 4 pages revised in response to this request for additional information. Attachment II also contains the removal/insertion instructions for the replacement pages. Revision bars placed in the right margin of the affected pages indicate where the changes occurred.

As a result of further NRC review, the District made editorial changes to pages 2 of 9 and 3 of 9 in Section 5 of Emergency Plan Change 4. Attachment II contains these changed pages.

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Further District review resulted in editorial changes to the following Emergency Plan Change 4 pages:

1. Page 2 of 7 in Section 3, subsection 3.2.3,
2. Page 2 of 6 in Section 7 subsection 7.2.2.1, and
3. Pages 2 of 3 and 3 of 3 in Appendix B.

These three editorial changes are discussed as follows:

1. Subsection 3.2.3 is editorially modified to include a descriptive definition for Alert to be consistent with the description for Unusual Event (subsection 3.2.2).
2. Previous subsection 7.2.2.1.3, Piping System isometrics, is deleted because these documents are located in Site Document Control, are available for personnel use, and are not present in either the Control Room or the Technical Support Center.
3. In Appendix B, reference to the Horizon Helicopter contract is deleted and the support services contracts are renumbered 1 through 7. Helicopter services are not required to implement or support Emergency Plan Change 4.

Members of your staff with questions requiring additional information or clarification may contact Richard Mannheimer at (209) 333-2935, extension 4916.

Sincerely,



Dan R. Keuter  
Assistant General Manager  
Nuclear

Attachments

cc w/atch: J. B. Martin, NRC, Walnut Creek  
C. Myers, NRC, Rancho Seco  
S. Reynolds, NRC, Rockville

ATTACHMENT I

District's Response to NRC Request  
for Additional Information

NRC Request No. 1, Emergency Planning Zone (EPZ):

- a. Figure 2-1, EPZ, needs a scale or key showing the size of the EPZ.
- b. In the definition for EPZ, Section 1.2.10, indicate the size of the EPZ.

District Response:

In response to NRC Request No. 1a, Emergency Plan Change 4 Figure 2-1 (Section 2, page 5 of 5) is modified to include a footnoted statement which says, "The shortest distance from the limiting accident release point to the EPZ boundary (the Industrial Area boundary) is 100 meters." Also, the District determined the total EPZ area (or industrial area) is approximately 87 acres and included this information on the Figure.

In response to NRC Request No. 1b, the definition for EPZ (Section 1, subsection 1.2.10, page 3 of 5) is modified to include the same information as provided on Figure 2-1. See Attachment II to this letter for the corrected Emergency Plan Change 4 pages.

NRC Request No. 2, Notification:

The licensee has not committed to:

- a. The 15 minute notification requirement for state and local governments (10 CFR 50, Appendix E, Section IV.D.3), and
- b. The one hour NRC notification requirement (10 CFR 72).

District Response:

In response to NRC Request No. 2a, the District contends that Emergency Plan Change 4 complies with the 15 minute State and local government notification capability requirement. The District's stated goal is to contact the appropriate agencies within 15 minutes following declaration of an emergency. 10 CFR 50, Appendix E, Section IV.D.3 states, "A licensee shall have the capability to notify responsible State and local government agencies within 15 minutes after declaring an emergency." (emphasis added) The District provides the communication system procedures and emergency response organization needed to ensure this capability. Also, subsection 6.2.3.1 of Emergency Plan Change 4 is editorially modified to clarify this capability. Modified subsection 6.2.3.1 is included in Attachment II to this letter.

In response to NRC Request No. 2b, the District has modified subsection 6.2.3.1 (Section 6, page 2 of 5) to ensure the NRC is notified within one hour after declaration of an emergency in accordance with 10 CFR 50.72. See Attachment II.

NRC Request No. 3, Onsite Emergency Response Facilities and Equipment:

The Operational Support Center (OSC) needs to be addressed or added into the E-Plan (10 CFR 50.47(b)(8)).

District Response:

The OSC functions and duties applicable in the long term defueled condition are combined into the TSC in Emergency Plan Change 4.

The OSC related functions and duties specified in the current implemented version of the Emergency Plan (Change 3) are as follows:

1. Provides the coordination point for the assembly and dispersion of response teams.
2. Provides a central dispatch point for search and rescue teams (OSC Coordinator).
3. Provides a central dispatch point for radiological monitoring teams (OSC R&L Logistics Coordinator).
4. Provides a central dispatch point for repair teams (Maintenance Logistics Coordinator).
5. Provides a central dispatch point for the PASS team (Radiological Assessment Coordinator).

The following evaluates the disposition of the current OSC functions and duties, and provides information that shows how the OSC functions and duties are combined into the TSC in Change 4 to the Emergency Plan.

For OSC function 1 above, TSC personnel (i.e., the Emergency Response Coordinator (ERC), the Radiological Assessment Coordinator (RAC), the Maintenance Coordinator, and the Security Coordinator) will coordinate the assembly and dispersion of response teams. The TSC contains sufficient workspace, personnel, and communications equipment to perform this function. See revised Emergency Plan Change 4 Section 7, page 2 of 6 in Attachment II. Individual duties absorbed by TSC personnel are addressed below.

For OSC function 2 above, the ERC, RAC, and Security Coordinator will coordinate the assembly and dispatch of search and rescue teams. Reference Emergency Plan Implementing Procedure (EPIP) 5200, Technical Support Center.

For OSC function 3 above, the RAC will coordinate the assembly and dispatch of radiological monitoring teams. See Emergency Plan Change 4 Section 5.4.2.4.2, and reference EPIP-5200.

For OSC function 4 above, the Maintenance Coordinator and the RAC will coordinate the assembly and dispatch of the repair teams. Reference EPIP-5305, Response Teams.

For OSC function 5 above, PASS is not required when the plant is shut down; therefore, the requirement for this OSC function is not applicable in the long term defueled condition and is not included in Emergency Plan Change 4.

#### NRC Request No. 4, Technical Support Center (TSC):

The licensee has not committed to the one hour activation of the TSC outside normal working hours (NUREG 0737, Supplement 1).

#### District Response:

The two hour TSC activation period allowed during other than normal working hours in Emergency Plan Change 4, subsection 7.2.2 is based on the following:

1. As acknowledged by the NRC in Reference 2, the radiological consequences associated with an accident considered credible in the defueled condition are very small and do not exceed the EPA's Protective Action Guidelines (PAGs) at the EPZ boundary (the Industrial Area fence).
2. Mitigation of the limiting accident considered credible in the defueled condition is not dependent on immediate response. As evaluated in Reference 3, the minimum time to boil the spent fuel pool following a loss of cooling is 5 days. Also, the spent fuel pool configuration ensures a spent fuel pool piping failure will not cause the pool to drain down below 10 feet above active fuel.

Furthermore, a review of NUREG-0696 Section 2.1, Technical Support Center Function, reveals many of the TSC required functions are not applicable in the defueled condition. For example:

1. The control room operators no longer require immediate relief of peripheral duties and communications not directly related to reactor system manipulations. The control room operators have significantly less accident response demands in the defueled condition. The remaining credible accidents no longer require operators to manipulate reactor controls. Therefore, TSC activation within one hour is not essential to relieve control room operators of peripheral duties and communications during the defueled condition.
2. Relieving congestion in the control room is not a significant concern because of the reduced operator demands associated with the control and mitigation of credible accidents in the defueled condition. Also, congestion relief is not critical in the defueled condition, because the number of personnel necessary to respond to an accident at a plant in the defueled condition is significantly less than the number required to respond to an accident at an operating plant. Therefore, TSC activation within one hour is not essential in the defueled condition.
3. TSC performance of EOF functions until the EOF is functional is not applicable in the defueled condition. The EOF is not a required facility in Change 4 to the Emergency Plan. Offsite participation of State and local agencies is not required because the EPA PAGs are not exceeded at the Change 4 EPZ boundary.

Based on the above information, the District concludes TSC activation within two hours during other than normal working hours following the declaration of an emergency is reasonable and acceptable in the defueled condition. A one hour activation requirement is retained in Change 4 during normal working hours.

NRC Request No. 5, Drills and Exercises:

The licensee has not committed to conduct an annual onsite exercise (10 CFR 50, Appendix E, Section IV.F.2).

District Response:

The District intends to comply with 10 CFR 50, Appendix E, Section IV.F.2. Emergency Plan Change 4, subsection 8.3 (Section 8, page 3 of 5) addresses the drill and exercise requirements during the long term defueled condition. Also, the table of contents, page 4 of 5 is editorially modified for consistency with subsection 8.3. Subsection 8.3.5 is modified to address the annual onsite exercise requirement. These changes are included in Attachment II.



NRC Request No. 6, Telephone Lists/Letters of Agreement:

- a. Telephone lists are not available in the Emergency Plan, nor is the reader directed to the EPIPs.
- b. Letters of agreement for supporting services are listed by contract number. Copies are not available in the Emergency Plan, nor is the reader directed to the EPIPs for copies of these agreements.

District Response:

In response to NRC Request No. 6a, Emergency Plan Change 4, subsection 8.6.1 (page 4 of 5 of Section 8) is modified to provide a specific reference for the location of the emergency telephone numbers. These numbers are located in the Emergency Response Telephone Directory and are available for inspection upon request. See Attachment II for revised subsection 8.6.1.

In response to NRC Request No. 6b, Emergency Plan Change 4, subsection 8.6.2 (page 5 of 5 of Section 8) is editorially modified to inform the reader that the emergency preparedness supporting services agreements are referenced in Appendix B to the Emergency Plan. These agreements are maintained on file and are available for inspection on request. Inclusion of the actual agreements, contracts, and/or Memorandums Of Understanding in the Emergency Plan or EPIPs is administratively impractical and burdensome and is an uncommon practice in the industry. See Attachment II for revised Section 8.6.2.