



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

January 3, 1991

*Docket File*

Docket No. 50-312

Mr. Dan R. Keuter  
Assistant General Manager, Nuclear  
Rancho Seco Nuclear Generating Station  
14440 Twin Cities Road  
Herald, California 95638-9799

Dear Mr. Keuter:

SUBJECT: INTERIM RELIEF REGARDING RANCHO SECO TECHNICAL SPECIFICATION 4.20,  
SYSTEM GASEOUS EFFLUENT FLOW RATE DEVICES (TAC NO. 76453)

In a letter of March 26, 1990, you requested an interim waiver, until approval of the Rancho Seco Decommissioning Plan, from radioactive gaseous effluent monitoring instrumentation surveillance requirements in Technical Specification 4.20 for (1) the reactor building purge vent system effluent flow rate device, (2) the auxiliary building stack system effluent flow rate device, and (3) the auxiliary building grade level vent system effluent flow rate device.

You based your waiver request on the following:

1. Rancho Seco is defueled with all fuel in the spent fuel pool building.
2. The District (the Sacramento Municipal Utility District, the licensee) does not intend to resume power operations at Rancho Seco.
3. Design basis accidents for a nuclear facility in a defueled condition are all associated with loss of fuel pool water inventory or with fuel handling.

Specifically, you requested to not perform the surveillance requirements of Technical Specification 4.20 for the three system effluent flow rate devices listed above, which would result in those system effluent flow rate devices being declared inoperable. As a result, you would perform the compensatory actions specified in Technical Specification Table 3.16-1 for each of the three system flow rate devices. The compensatory action for all three devices is the same and is as follows:

"With the flow rate device inoperable, effluent releases may continue provided the flow rate used is the maximum design flow rate."

In a letter of May 15, 1990, you responded to our questions concerning this interim relief request. In this letter, you stated that the maximum design flow rate that will be used for the flow rate devices are as follows:

1. Reactor building purge vent stack - 74,000 CFM.

*LFJ/110*

2. Auxiliary building stack - 47,740 CFM.
3. Auxiliary grade level vent - 21,450 CFM.

The Technical Specifications do not have a time limit or duration associated with this compensatory action. Additionally, since this compensatory action is already included in the Technical Specification, the NRC has reviewed and accepted this action as appropriate to protect the health and safety of the public and does not involve a significant hazards consideration.

You have stated that in the current defueled condition, that the only isotope recently present in the gaseous effluents has been tritium. Additionally, you provided information that shows a comparison of typical concentrations from the affected gaseous effluent release points when operating versus the current defueled condition, which demonstrates that the current concentrations are much lower than during power operations.

You further state that by using the maximum design flow rates as default values for the flow, an overestimation of gaseous effluent releases of about 25 percent from the affected pathways will occur; however, that this will still be well below both 10 CFR Part 20 and 10 CFR Part 50, Appendix I values. You state that this overestimation is conservative in the protection of the health and safety of the public.

This request does not involve an irreversible environmental consequences as the actual and recorded effluent releases will still be well below both 10 CFR Part 20 and 10 CFR Part 50, Appendix I values.

Although not mentioned in your request, you have submitted a proposed license amendment for a Permanently Defueled Technical Specification and in that submittal you request to move the radioactive effluent monitoring requirements to the Offsite Dose Calculation Manual and the Radiological Environmental Monitoring Program as suggested in Generic Letter 89-01.

With regard to the length of time that this interim relief is granted, you requested the waiver until the Rancho Seco Decommissioning Plan is approved. However, you have not submitted the decommissioning plan to the NRC (which is due no later than June 6, 1991) and the staff may require a year or more to review and approve your submittal. However, if approved, your Permanently Defueled Technical Specification would negate the need for this waiver.

The staff has reviewed your request, including the information provided in your letters of March 26 and May 15, 1990. You are granted a temporary waiver of compliance that allows you not to perform the surveillance requirements of Technical Specification 4.20 for the three system effluent flow rate devices above. You are to declare the three flow rate devices inoperable and take the compensatory action specified in Technical Specification Table 3.16-1. This

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Mr. Dan R. Keuter

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interim waiver will remain in effect until the Permanently Defueled Technical Specification is approved, or the staff informs you that the Permanently Defueled Technical Specification or applicable portions are not acceptable.

If you have any questions, please contact Mr. Steven A. Reynolds at (301) 492-1368.

Sincerely,

Original signed by:

Dennis M. Crutchfield, Director  
Division of Advanced Reactors  
and Special Projects  
Office of Nuclear Reactor Regulation

cc: See next page

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[SR LTR2 DKeuter]

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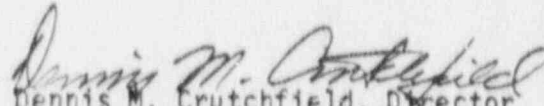
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Sincerely,

  
Dennis M. Crutchfield, Director  
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and Special Projects  
Office of Nuclear Reactor Regulation

cc: See next page

Mr. Dan R. Keuter

Rancho Seco Nuclear Generating  
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