



SACRAMENTO MUNICIPAL UTILITY DISTRICT P. O. Box 15830, Sacramento CA 95852-1830, (916) 452-3211  
 AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA  
 MPC&D 057

June 2, 1994

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

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

**RANCHO SECO ANNUAL REPORT**

Attention: Seymour Weiss

The District hereby submits the Rancho Seco Annual Report, required pursuant to Rancho Seco Permanently Defueled Technical Specification (PDTS) D6.9.4 and 10 CFR 50.59(b)(2). The enclosed Rancho Seco Annual Report contains (1) shutdown statistics, (2) a narrative summary of shutdown experience, and (3) tabulations of facility changes, tests, and experiments required pursuant to 10 CFR 50.59(b).

This annual report covers the period May 7, 1993, through May 6, 1994. The NRC approved the PDTS in April 1992, and Rancho Seco implemented the PDTS on May 7, 1992. Prior to May 1992, Rancho Seco submitted monthly reports in accordance with the Operating Plant Technical Specifications.

Members of your staff requiring additional information or clarification may contact Jerry Delezenski at (916) 452-3211, extension 4914.

Sincerely,

*Steve J. Redeker*  
 Steve J. Redeker  
 Manager  
 Plant Closure & Decommissioning

Enclosure

cc: L. J. Callan, NRC, Arlington, Texas  
 T. Markley, NRC, Rockville

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Shutdown Statistics:

The District provides the following shutdown statistics:

1. Rancho Seco permanently shut down nuclear power operations on June 7, 1989.
2. The Rancho Seco reactor has been defueled since December 8, 1989.
3. The NRC granted Rancho Seco a Possession-Only License (POL) on March 17, 1992. Rancho Seco has been in the Permanently Defueled Mode (PDM) during the entire reporting period (May 7, 1993, through May 6, 1994).
4. The Rancho Seco Spent Fuel Pool (SFP) contains 493 spent fuel assemblies and is licensed for 1080 spent fuel assemblies.
5. No spent fuel assemblies were moved during the reporting period.

Shutdown Experience Summary:

The District provides the following shutdown experience summary:

1. Rancho Seco is proceeding towards decommissioning and continues to pursue Decommissioning Plan and Independent Spent Fuel Storage Installation (ISFSI) license approval. Also, Rancho Seco continues to safely store its spent nuclear fuel in the SFP without incident.
2. The District successfully completed its annual Rancho Seco emergency exercise.
3. Rancho Seco personnel successfully calibrated the SFP level instrumentation.
4. The District continued draining systems and components that are not required to function during the PDM in accordance with the Lay-Up and SAFSTOR programs in preparation for eventual decommissioning.
5. Rancho Seco personnel processed radioactive waste water, collected from drained system and contained in storage tanks, through the Miscellaneous Wastes Evaporator and Blender/Dryer.
6. The District responded to NRC Bulletin 94-01, "Potential Fuel Pool Drain-down Caused by Inadequate Maintenance Practices at Dresden Unit 1," in accordance with 10 CFR 50.54(f). The District's response detailed the Rancho Seco programs that ensure continued safe maintenance of spent fuel during the PDM.

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Shutdown Experience Summary: (Continued)

7. The NRC accepted Rancho Seco Emergency Plan Section 5, Revision 6, as continuing to meet the applicable planning standards in 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. Based on this NRC acceptance, the District removed Chem/RP Decommissioning technicians from 24-hour shift coverage and implemented the Rancho Seco Radiation Protection (RP) Responder Program.
8. The District completed the required training and implementation of the revised 10 CFR 20 requirements, effective January 1, 1994.
9. The NRC approved the District's exemption request from the full requirements of 10 CFR 50.120 (The Training Rule).
10. As part of the District's asset recovery program, the District removed the following significant components and material from Rancho Seco: (NOTE: Only components and material that are not required to support plant operations during the PDM are eligible for the District's asset recovery program.)
  - a. The spare main transformer
  - b. The ammonia contained in the bulk ammonia storage tank
  - c. Two Moisture Separator Re-heater coil bundles
11. The District completed modifications to the handling tool (the Elmo Brown tool) that will be used to facilitate control components insertion into fuel assemblies.
12. The District replaced the Spent Fuel Cooler relief valve with an inspected valve as part of the Rancho Seco In-service Confirmation Program.
13. The District removed the last PCB containing oil from the Rancho Seco site.
14. Rancho Seco personnel repaired the diesel driven fire pump regulator and starter. The District identified equipment problems during routine, periodic maintenance.
15. The District removed six underground diesel fuel oil storage tanks from the Rancho Seco site.
16. Rancho Seco personnel repaired the plant air compressor after-coolers.

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Shutdown Experience Summary: (Continued)

17. The NRC approved an exemption from 10 CFR 140.11(a)(4) that authorized a reduction in primary financial protection to a level of \$100,000,000 and an exemption from participation in the nuclear industry retrospective rating plan (secondary financial protection).

10 CFR 50.59(b) SUMMARY:

The following is a tabulation of the facility changes, tests, and experiments that occurred at Rancho Seco, from May 7, 1993, through May 6, 1994, that required a 10 CFR 50.59 safety evaluation. None of the changes evaluated in accordance with 10 CFR 50.59 resulted in an Unreviewed Safety Question.

**Procedure CAP-0002, Rev. 5, "Off-site Dose Calculation Manual,"** was revised to implement the new 10 CFR 20 regulations, which became effective January 1, 1994. During review of the Off-site Dose Calculation Manual (ODCM) changes, the District identified a change required in the Radiological Environmental Monitoring Program (REMP) Manual. The definition for Member(s) of the Public does not agree with the new 10 CFR 20 regulations. This change directly affected the ODCM, affects the REMP Manual, but did not affect any other License Basis Documents (LBDs).

**Procedure CAP-0006, Rev. 9, "Chemistry Frequencies, Ranges, and Limits,"** removed Nuclear Service Raw Water (NSRW) system water chemistry analysis requirements. Since the NSRW system is not required to function during the PDM and is drained, water chemistry analysis requirements are not necessary. This procedure change requires a change to Defueled Safety Analysis Report (DSAR) section 9.2, "Cooling Water Systems," to remove reference to the NSRW system, but did not affect any other LBDs.

**Defueled Safety Analysis Report Section 9.6.2.4, "Safety Provisions,"** was revised to correct an erroneous statement in the DSAR and clarify that administrative controls ensure the fuel transfer tubes are maintained closed during the PDM and the SFP will not drain down via this pathway. The only licensing basis commitment associated with the SFP stop log is that the stop log is required to be in place prior to draining the fuel transfer canal with the fuel transfer tubes open. Since the fuel transfer tubes are administratively maintained closed, the potential does not exist for draining the SFP via this pathway and the stop log is not required to be in place during the PDM. Based on the existing plant licensing design basis, the District concluded that the DSAR mistakenly stated that the fuel transfer tubes are isolated from the SFP storage area by a stop log. This change directly affected the DSAR, but did not affect any other LBDs.

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**Design Change Package No. R91-0001AA** provides for construction of the ISFSI concrete pad and fencing. This facility change requires a change to DSAR Figure 2.2-2, Rancho Seco Emergency Plan (RSEP) Figure 2-1, and several parts of the Rancho Seco Decommissioning Plan (RSDP) to show the final, proposed ISFSI location. This change will not affect any other LBDs.

**Design Change Package No. R92-0007AB** removes the temporary construction Bechtel building and requires the following License Basis Document (LBD) changes once this building is removed: (1) DSAR Figures 1.1-2, 1.1-3, and 2.2-2; (2) ISFSI Safety Analysis Report (SAR) Figures 1-1 and 2-2; (3) RSDP Figures 1-3, 1-4, and 7-1; and (4) Rancho Seco Physical Security Plan (RSPSP) section 2.2 § 1, Figure G-1. This change will not affect any other LBDs.

**Deviation from Quality No. 94-0006** addresses plant drawings that do not reflect the current plant configuration. The disposition for Deviation from Quality (DQ) No. 94-0006 requires an update of the appropriate drawings, including DSAR Figure 11.2-2. The only LBD that the disposition for DQ 94-0006 affected is the DSAR.

**Rancho Seco Emergency Plan Section 5, Rev. 6, "Organizational Control of Emergencies,"** was revised to (1) allow removal of Chem/RP Decommissioning Technicians from 24-hour shift coverage and (2) facilitate implementation of the RP Responder Program. This RSEP change required NRC approval prior to implementation. The NRC approved this RSEP change in Robert J. Pate (NRC) to J. Shetler (SMUD) letter dated November 2, 1993. This RSEP change also requires a change to DSAR section 12.1.2.2, "Operator Shift Crews," but did not affect any other LBDs.

**Rancho Seco Decommissioning Fire Protection Plan, Rev. 0,** replaced the previous plant Fire Protection Plan and reflects the fire protection requirements applicable to a nuclear plant with a POL. The Rancho Seco Decommissioning Fire Protection Plan (RSDFP) was developed in accordance with 10 CFR 50, Appendix A, General Design Criteria 3, "Fire Protection," to minimize the adverse effects on structures, systems, and components important to safety. The RSDFP permits modification of the site Fire Brigade to an Incipient Fire Brigade response team with primary reliance on off-site fire fighting agencies. The RSDFP establishes a new site fire protection plan LBD.

**Rancho Seco Decommissioning Fire Protection Plan, Rev. 1,** updated the RSDFP to reflect the current plant status and removed inconsistencies in the application of specific RSDFP requirements. This change directly affected the RSDFP and did not affect any other LBDs.

**Global QA Class Designation Change, Form ADM-273, dated June 3, 1993,** permitted the plant systems listed below, with specific component exceptions, to be designated QA Class 4 and made available to the District's resource recovery program. Only those structures, systems, sub-systems, and equipment that are no longer required to

**RANCHO SECO ANNUAL REPORT****Global QA Class Designation Change, Form ADM-273, dated June 3, 1993,  
(Continued)**

function or remain in place to support plant operations during the PDM are eligible to be designated QA Class 4. The 18 systems included in this QA Class designation change are the Containment Electrical Penetrations (with clarifying note), Cranes and Hoists (with component exceptions), Emergency Feed-water Initiation and Control, Emergency Generator (with clarifying note), Electro-Hydraulic Oil, Hydrogen Gas, Integrated Control, Lube Oil, Main Circulating Water (with clarifying note), Main Generator, Nuclear Instrumentation, Nuclear Raw Water, Reactor Building Cranes (with component exceptions), Reactor Protective, Safety Features, Site Meteorological (with clarifying note), Seal Oil, and Turbine Supervisory Instrumentation systems.

This QA Class designation change requires a change to DSAR Figure 9.5-1, because the Electro-Hydraulic Oil system is partially depicted in this figure. Removing reference to the Nuclear Raw Water system in the DSAR is already addressed in previous 10 CFR 50.59 evaluations. Also, this QA Class designation change affected the old plant Fire Protection Plan, but, the RSDFP implemented the necessary changes resulting from this QA Class change. This QA Class designation change did not affect any other LBDs.

**Global QA Class Designation Change, Form ADM-273, dated June 8, 1993,** permitted the plant systems listed below, with specific component exceptions, to be designated QA Class 4 and made available to the District's resource recovery program. Only those structures, systems, sub-systems, and equipment that are no longer required to function or remain in place to support plant operations during the PDM are eligible to be designated QA Class 4. The 14 systems included in this QA Class designation change are the Air Ejector, Auxiliary Feed-water, Diesel Fuel Oil (with component exceptions), Extraction Steam, Gland Steam and Condenser, Heater, Drain, and Vents, High Pressure Turbine, Main Condensate and Make-up, Main Feed-water, Main Steam, Nitrogen Gas, Secondary Chemical Addition (with component exceptions), Steam Generator (with clarifying note), and Turbine Plant Sample systems.

This QA Class designation change requires a change to DSAR section 9.8, "Plant Compressed Service Gas Systems," because the Nitrogen Gas System is not required to function during the PDM. Also, this QA Class designation change affected the old plant Fire Protection Plan, but, the RSDFP implemented the necessary changes resulting from this QA Class change. This QA Class designation change did not affect any other LBDs.

**Global QA Class Designation Change, Form ADM-273, dated June 14, 1993,** permitted the plant systems listed below, with specific component exceptions, to be designated QA Class 4 and made available to the District's resource recovery program. Only those structures, systems, sub-systems, and equipment that are no longer required to function or remain in place to support plant operations during the PDM are eligible to be designated QA Class 4. The 14 systems included in this QA Class designation change are

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**Global QA Class Designation Change, Form ADM-273, dated June 14, 1993,**  
(Continued)

the Borated Water (with component exceptions), Containment Building Spray, Core Flood, Control Rod Drive, Decay Heat, Nuclear Service Water, Purification and Letdown, Pressurizer Relief Tank, Reactor Coolant Drain (with component exceptions), Reactor Coolant, Radiation Monitoring (with component exceptions), Reactor Sample, Seal Injection and Makeup, and Waste Gas (with component exceptions) systems.

This QA Class designation change requires changes to DSAR section 7.4.5, "Control Room Occupancy," and DSAR Figures 9.4-1, 9.5-1, 9.5-2, and 9.5-6 to reflect that several plant radiation monitors are not required to function during the PDM. Other plant radiation monitor related DSAR changes to sections in DSAR chapters 7, 9, and 11, are addressed in previous 10 CFR 50.59 evaluations. Removing reference to the Nuclear Service Water and Decay Heat systems in the DSAR (sections 9.2 and 9.3, respectively) is already addressed in previous 10 CFR 50.59 evaluations. Also, this QA Class designation change affected the old plant Fire Protection Plan, but, the RSDFPF implemented the necessary changes resulting from this QA Class change. This QA Class designation change did not affect any other LBDs.

**Proposed License Amendment No. 187, "New 10 CFR 20 Implementation Changes,"** requests NRC approval of proposed changes to the Rancho Seco Permanently Defueled Technical Specifications (PDTs) consistent with the new, revised 10 CFR 20 regulations. These PDTs changes are editorial and administrative in nature and are not required for implementation of the new 10 CFR 20 regulations. This proposed license amendment directly affects the PDTs and does not affect any other LBDs.

**Process Control Program Manual, Rev. 1,** editorially updated the Process Control Program (PCP) Manual and changed some waste classification sample frequencies specified in the PCP. This change directly affected the PCP Manual, but did not affect any other LBDs.

**Procedure RP.305.40, Rev. 0, "RP Responder Instructions,"** established a new procedure designed to train and qualify Operations personnel as RP Responders. This new procedure facilitated implementation of the RP Responder Program in coordination with revision 6 to RSEP section 5 (see change summary above). RP Responders are not trained or qualified to perform any health physics functions or other activities that require ANSI qualified Radiation Protection Technicians. RP Responders are trained and qualified to perform (1) initial response actions for anticipated off-normal radiological situations that could reasonably occur during off-normal site working hours and (2) routine operator activities such as surveillances, inspections, and/or operation of plant equipment in high radiation or contamination areas under the appropriate Radiation Work Permit. This new procedure requires the same DSAR change as addressed in RSEP Section 5, Revision 6, and did not affect any other LBDs.

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**Procedure RP.312.I.02, Rev. 2, "TLD Issue - New Employees,"** was revised to implement the new, revised 10 CFR 20 regulations, which became effective January 1, 1994. This procedure change affects several sections in DSAR chapter 11, but did not affect any other LBDs.

**Procedure RP.315.I.03, Rev. 2, "ALARA Job Planning Guidelines,"** was revised to implement the new, revised 10 CFR 20 regulations, which became effective January 1, 1994. This procedure change affects several sections in DSAR chapter 11, but did not affect any other LBDs.

**Procedure RP.312.I.05, Rev. 3, "Dosimetry Visitor Monitoring,"** was revised to implement the new, revised 10 CFR 20 regulations, which became effective January 1, 1994. This procedure change affects several sections in DSAR chapter 11, but did not affect any other LBDs.

**Procedure RP.312.I.12, Rev. 1, "Routine TLD Issue,"** was revised to implement the new, revised 10 CFR 20 regulations, which became effective January 1, 1994. This procedure change affects several sections in DSAR chapter 11, but did not affect any other LBDs.

**Procedure RP.312.I.13, Rev. 1, "Abnormal Dosimetry Reports,"** was revised to implement the new, revised 10 CFR 20 regulations, which became effective January 1, 1994. This procedure change affects several sections in DSAR chapter 11, but did not affect any other LBDs.

**Procedure RP.312.I.14, Rev. 2, "Occupational Radiation Exposure Limits and Extensions,"** was revised to implement the new, revised 10 CFR 20 regulations, which became effective January 1, 1994. This procedure change affects several sections in DSAR chapter 11, but did not affect any other LBDs.

**Procedure RP.312.I.16, Rev. 2, "Dosimetry Issue Access Control,"** was revised to implement the new, revised 10 CFR 20 regulations, which became effective January 1, 1994. This procedure change affects several sections in DSAR chapter 11 and the ISFSI SAR, but did not affect any other LBDs.

**Procedure RSAP-0511, Rev. 3, "Control of Nuclear Division Policies,"** was voided in lieu of Nuclear Management Directive memoranda, controlled and issued by the Manager, Plant Closure & Decommissioning. This procedure change requires a change to DSAR section 12.1.2.1, item 6, to remove reference to "Nuclear Policy," but did not affect any other LBDs.



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**Rancho Seco Quality Manual, Section I, Rev. 8, "Organization,"** made the Rancho Seco Quality Manual (RSQM) consistent with the NRC approved PDTS changes addressed in Rancho Seco Facility License Amendment No. 121, "Nuclear Organization Changes." This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section II, Rev. 7, "Quality Assurance Program,"** revised the Rancho Seco Quality Manual (RSQM) consistent with the NRC approved PDTS changes addressed in Rancho Seco Facility License Amendment No. 121, "Nuclear Organization Changes." Also, this change removed reference to Environmental Qualification requirements for safety-related equipment per License Amendment No. 119, "PDTS," and made several editorially updates to the RSQM. This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section III, Rev. 6, "Design Control,"** removed reference to (1) Environmental Qualification requirements for safety-related equipment based on NRC approval of License Amendment No. 119, "PDTS," and (2) Training Simulator requirements based on NRC approval of exemption from 10 CFR 55.45(b). This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section IV, Rev. 6, "Procurement Document Control,"** editorially changed the references to Quality Assurance program responsibilities from individuals (i.e., Technical Services Supervisor) to organizations/groups (i.e., Technical Services). This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section IV, Rev. 7, "Procurement Document Control,"** clarified the verification requirements associated with suppliers on the Approved Suppliers List. This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section V, Rev. 6, "Instructions, Procedures, and Drawings,"** editorially changed the references to Quality Assurance program responsibilities from individuals (i.e., Technical Services Supervisor) to organizations/groups (i.e., Technical Services). This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section VI, Rev. 6, "Document Control,"** editorially changed the references to Quality Assurance program responsibilities from individuals (i.e., Technical Services Supervisor) to organizations/groups (i.e., Technical Services). This change directly affected the RSQM and did not affect any other LBDs.

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**Rancho Seco Quality Manual, Section VII, Rev. 6, "Control of Purchased Material, Equipment, and Services,"** editorially changed the references to Quality Assurance program responsibilities from individuals (i.e., Technical Services Supervisor) to organizations/groups (i.e., Technical Services). This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section VIII, Rev. 6, "Identification and Control of Material, Parts, and Components,"** editorially changed the references to Quality Assurance program responsibilities from individuals (i.e., Technical Services Supervisor) to organizations/groups (i.e., Technical Services). This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section IX, Rev. 7, "Control of Special Processes,"** editorially changed the references to Quality Assurance program responsibilities from individuals (i.e., Technical Services Supervisor) to organizations/groups (i.e., Technical Services). Also, this change clarified (1) the procedural requirements associated with the control of special processes and (2) the responsibility for performing Non-Destructive Examinations (NDE). This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section X, Rev. 7, "Inspection,"** editorially changed the references to Quality Assurance program responsibilities from individuals (i.e., Technical Services Supervisor) to organizations/groups (i.e., Technical Services). This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section XI, Rev. 6, "Test Control,"** editorially changed the references to Quality Assurance program responsibilities from individuals (i.e., Technical Services Supervisor) to organizations/groups (i.e., Technical Services). This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section XII, Rev. 6, "Control of Measuring and Test Equipment,"** editorially changed the references to Quality Assurance program responsibilities from individuals (i.e., Technical Services Supervisor) to organizations/groups (i.e., Technical Services). This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section XIII, Rev. 6, "Handling, Storage, and Shipping,"** editorially changed the references to Quality Assurance program responsibilities from individuals (i.e., Technical Services Supervisor) to organizations/groups (i.e., Technical Services). This change directly affected the RSQM and did not affect any other LBDs.

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**Rancho Seco Quality Manual, Section XIV, Rev. 6, "Inspection, Test, and Operating Status,"** editorially changed the references to Quality Assurance program responsibilities from individuals (i.e., Technical Services Supervisor) to organizations/groups (i.e., Technical Services). This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section XV, Rev. 6, "Procurement Document Control,"** editorially changed the references to Quality Assurance program responsibilities from individuals (i.e., Technical Services Supervisor) to organizations/groups (i.e., Technical Services). This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section XVI, Rev. 6, "Corrective Action,"** editorially changed the references to Quality Assurance program responsibilities from individuals (i.e., Technical Services Supervisor) to organizations/groups (i.e., Technical Services). This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section XVII, Rev. 6, "Quality Assurance Records,"** editorially changed the references to Quality Assurance program responsibilities from individuals (i.e., Technical Services Supervisor) to organizations/groups (i.e., Technical Services). This change directly affected the RSQM and did not affect any other LBDs.

**Rancho Seco Quality Manual, Section XVIII, Rev. 6, "Audits,"** editorially changed the references to Quality Assurance program responsibilities from individuals (i.e., Technical Services Supervisor) to organizations/groups (i.e., Technical Services). This change directly affected the RSQM and did not affect any other LBDs.

**Long Term Defueled Condition Physical Security Plan, Amendment 7,** incorporates proposed ISFSI security measures into the RSPSP. The proposed ISFSI security measures are consistent with the current 10 CFR 73 and 10 CFR 72 security requirements applicable to Rancho Seco, including existing 10 CFR 73 exemptions previously granted by the NRC. RSPSP Amendment 7 requires NRC approval prior to implementation because RSPSP Amendment 7 incorporates previously granted 10 CFR 73 exemptions into the 10 CFR 72 ISFSI security measures. This proposed change directly affects the RSPSP, but does not affect any other LBDs.

**SAFSTOR Modification No. SAF-0018C-1, Rev. 0, "Radiation Monitoring System,"** disables process radiation monitors R-15006, R-15007, R-15009, R-15010, R-15026, R-15027, R-15032, R-15035, and R-15036. These monitors are associated with systems that are either drained, de-energized, and/or abandoned. These monitors are no longer required to function to protect plant personnel or public health and safety, or detect, monitor, and/or mitigate the consequences of any analyzed accidents, events, or conditions described in the DSAR. Also, the check sources in all out-of-service radiation monitors will be removed. This modification will require revision to DSAR Sections 7.4.2, "Information

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**SAFSTOR Modification No. SAF-0018C-1, Rev. 0, "Radiation Monitoring System," (Continued)**

Display and Control Function," 9.2.6, "Component and Turbine Plant Cooling Water," 9.5, "Station Ventilation Systems," 11.3, "Gaseous Waste Management System," and 11.8.4, "Radiation Monitoring System," including DSAR Figures 9.2-2 and 9.5-6, once the specified monitors are disabled. Implementation of this SAFSTOR Modification will not require a change to any other LBDs.

**SAFSTOR Report No. SAF-0051, Rev. 1, "Clean Drain System,"** will require a change to DSAR Section 11.2.3, "Waste Water Disposal," during the Preparation for Hardened SAFSTOR decommissioning phase to address (1) installation of an independent air supply for air operated valves at the Retention Basins and (2) replacement of the site sewage treatment plant. Implementation of this SAFSTOR Report will not require a change to any other LBDs.

**SAFSTOR Modification No. SAF-0035C-2, Rev. 0, "Emergency Generator System,"** removes the two Bruce-GM diesel generators and associated auxiliary equipment and isolates connections to plant systems in accordance with the RSDP and the resource recovery program. This modification will require revision to DSAR Figures 8.2-2 and 9.2-1, RSDP Figures 2-3, 2-11, 2-17, and 2-19, and RSDP Sections 2.2.4.1, "Plant Building Structures," and 2.2.4.5, "Miscellaneous Mechanical Systems," once the Bruce-GM diesel generators and associated equipment are removed. Implementation of this SAFSTOR Modification will not require a change to any other LBDs.

**SAFSTOR Modification No. SAF-0035C-3, Rev. 0, "Emergency Generator System,"** removes the two TDI diesel generators and associated auxiliary equipment and isolates connections to plant systems in accordance with the RSDP and the resource recovery program. This modification will require revision to DSAR Figure 8.2-2, RSDP Figure 2-19, and RSDP Sections 2.2.4.1, "Plant Building Structures," and 2.2.4.5, "Miscellaneous Mechanical Systems," once the TDI diesel generators and associated equipment are removed. Implementation of this SAFSTOR Modification will not require a change to any other LBDs.

**SAFSTOR Report No. SAF-0045, Rev. 1, "Instrument/Service Air System,"** will require a change to DSAR Section 9.8, "Plant Compressed Service Gas Systems," to address removal of one air compressor and then abandonment of the Instrument/Service Air System during the Preparation for Custodial and Preparation for Hardened SAFSTOR decommissioning phases, respectively. Implementation of this SAFSTOR Report will not require a change to any other LBDs.

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**SAFSTOR Report No. SAF-0060, Rev. 2, "Service Water System,"** will require a change to updated RSDP Table 5-1 to indicate that portions of the Service Water System (SWS) will be maintained functional through the Hardened SAFSTOR decommissioning phase instead of abandoning SWS during Preparation for Hardened SAFSTOR. Implementation of this SAFSTOR Report will not require a change to any other LBDs.

**SAFSTOR Report No. SAF-0063, Rev. 2, "Non-Nuclear Instrumentation System,"** will require a change to DSAR Sections 7.1, "Protection Systems," and 7.3, "Instrumentation," during the Preparation for Custodial SAFSTOR phase when the Non-Nuclear Instrumentation System (NNI) is abandoned after the remaining plant systems that NNI monitors are abandoned. Also, updated RSDP Table 5-1 requires revision to indicate NNI will be abandoned during the Preparation for Custodial SAFSTOR decommissioning phase instead of the Preparation for Hardened SAFSTOR decommissioning phase. Implementation of this SAFSTOR Report will not require a change to any other LBDs.

**SAFSTOR Modification No. SAF-0068C-1, Rev. 0, "Main Generator System,"** isolates the main generator and modifies the unit protection scheme accordingly. This modification will require a change to RSDP Figure 2-19 once the main generator is isolated. Implementation of this SAFSTOR Modification will not require a change to any other LBDs.

**SAFSTOR Report No. SAF-0072, Rev. 1, "Fuel Handling System,"** will require a change to DSAR Sections 1.6.13, "Fuel Storage Facility Design Basis," and 9.6, "Fuel Handling System," during the Preparation for Hardened SAFSTOR decommissioning phase. This system will be abandoned after the spent fuel is removed from the spent fuel pool. Implementation of this SAFSTOR Report will not require a change to any other LBDs.

**SAFSTOR Report No. SAF-0075, Rev. 2, "Waste Gas System,"** will require a change to updated RSDP Table 5-1 to address placing the Waste Gas System into its SAFSTOR configuration during the Preparation for Custodial SAFSTOR decommissioning phase and having no actions required during the Preparation for Hardened SAFSTOR decommissioning phase. Implementation of this SAFSTOR Report will not require a change to any other LBDs.

**SAFSTOR Report No. SAF-0087, Rev. 2, "Diesel Fuel Oil System,"** will require a change to updated RSDP Table 5-1 to address placing the Diesel Fuel Oil System into its SAFSTOR configuration during the Preparation for Hardened SAFSTOR decommissioning phase and having no actions required during the Preparation for Custodial SAFSTOR decommissioning phase. Implementation of this SAFSTOR Report will not require a change to any other LBDs.

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**SAFSTOR Modification No. SAF-0087C-1, Rev. 0, "Diesel Fuel Oil System,"** will require a change to RSDP Section 2.2.4.5, "Miscellaneous Mechanical Systems," once the specified diesel fuel oil storage tanks are removed. Implementation of this SAFSTOR Modification will not require a change to any other LBDs.

**SAFSTOR Report No. SAF-0091, Rev. 2, "Site Meteorological Monitoring System,"** requires a change to updated RSDP Table 5-1 to indicate this system will be placed into its SAFSTOR configuration during the Preparation for Custodial SAFSTOR decommissioning phase instead of during the Custodial SAFSTOR-Dormancy decommissioning phase. Implementation of this SAFSTOR Report will not require a change to any other LBDs.

**SAFSTOR Report No. SAF-0092, Rev. 2, "Main Circulating Water System,"** requires a change to updated RSDP Table 5-1 to address a change in the schedule for removing the cooling tower fill. The cooling tower fill will be removed during the Preparation for Custodial SAFSTOR decommissioning phase instead of the Preparation for Hardened SAFSTOR decommissioning phase. Implementation of this SAFSTOR Report will not require a change to any other LBDs.

**SAFSTOR Report No. SAF-0093, Rev. 2, "Miscellaneous Radwaste System,"** requires a change to DSAR Section 11.2.2, "Miscellaneous Liquid Radwaste System," and DSAR Table 11.2-1 to address removal of Spent Regenerant Tank T-689A and Miscellaneous Waste Concentrate Tank T-679B from service. Also, DSAR Section 11.2.2 will require a change during the Preparation for Hardened SAFSTOR decommissioning phase to address Miscellaneous Radwaste System (RWS) modifications.

In addition, RSDP Table 5-1 requires revision to address the actions required to place the RWS into Custodial SAFSTOR. Most of the RWS will be abandoned during the Preparation for Hardened SAFSTOR decommissioning phase, after the radioactive waste water remaining on-site is processed. Portions of the RWS necessary to collect RCS drainage and rainwater intrusion in the controlled areas of the Auxiliary Building and Solidification Structure will be maintained during Hardened SAFSTOR. Implementation of this SAFSTOR Report will not require a change to any other LBDs.

**Surveillance Procedure SP.346, Rev. 5, "Semi-annual Fire Detection Functional Test (H4FCP2 and H4FCP8),"** included the requirement to perform this semi-annual test for Fire Zone 109 (panel H4FCP8). This procedure change requires a change to RSDP Table 3-1 to address Fire Zone 109 and panel H4FCP8 testing, but did not affect any other LBDs.

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**Surveillance Procedure SP.349, Rev. 4, "Semi-annual Fire Detection Functional Test (H4FCP6),"** removed Fire Zone 109 semi-annual testing requirements so they could be included in SP.346 and deleted reference to Fire Zone 110. This procedure change requires a change to RSDFP Table 3-1 to remove reference to Fire Zone 110, but did not affect any other LBDs.

**Special Test Procedure STP-1329, Rev. 0, "1/4 Scale Model Cask Pre-operational Drop Test,"** addresses conducting a fuel cask drop test with impact limiters using a 1/4 scale cask model. This test does not constitute an Unreviewed Safety Question, does not pose a safety concern, but is a test that is not described in the DSAR. This Special Test Procedure does not require a change to any LBDs.

**Training Department Administrative Procedure TDAP-3010, Rev. 1, "Certified Fuel Handler Training Program,"** included a commitment the District made to the NRC to ensure NRC review and approval is obtained prior to implementation of changes that reduce the effective of the Certified Fuel Handler Training Program. This change directly affected a LBD, but did not require a change to any other LBDs.

Addressee: NRC  
S. WEISS

MPC #D 94-057

*Routing and BC Distribution List*

Routing*	BC w/encl	BC wo/encl	Name	Mail Stop
			General Manager	41
✓(1)			AGM & Chief Operations Officer/ Deputy AGM Nuclear	41
			Manager, Plant Closure & Decommissioning	255
✓(3)			Nuclear Quality/Licensing/Admin	250
			Technical Services	231
			Operations/Security	236
			Security	210
			Maintenance	253
			RP/EP/CHEM/EM	244
✓(last)			PRC/MSRC Coordinator	256
	✓		Licensing Corr. Tracking <i>R. Mannheimer</i> <i>(S. White)</i>	250
			SMUD Legal	42
		✓	Public Information	141
			T. Baxter <i>(Shaw Pittman)</i>	
			P. Fox <i>(ANI)</i>	
			J. McGranery <i>(ECO)</i>	
	✓		RIC Files	222
			RIC Files <i>(Decommissioning)</i>	222
			NUMARC	
			_LER, _Special Report, _Tech Spec, _NOV, or _Proposed Amendment Files	250
	✓		<i>R. Mannheimer</i>	<i>250</i>

\* Please route the attached correspondence in a timely manner.