



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

NL 89-458

May 22, 1989

U. S. Nuclear Regulatory Commission  
Reports Management Branch  
Office of Information Resources Management  
Washington, DC 20555

RESPONSE TO NRC LETTER DATED APRIL 7, 1989 REGARDING THE BACKFIT RULE

Dear Sir:

This letter constitutes the District's response to the NRC's Backfit rule questionnaire sent to all Licensees on April 7, 1989.

The District has not recently been significantly affected by the Backfit rule with one exception (see Bulletin 88-05 evaluation). The Backfit rule appears to be sufficiently clear and reasonably implemented by the NRC. Consistency with the NRC-defined backfit process is apparent. The implementation of Bulletin 88-05 appears to be an exception to an otherwise well maintained rule by the NRC.

The following is an evaluation of the impact on the District for five Backfit issues imposed by the NRC in 1988:

**NRC Bulletin 88-01: Defects in Westinghouse Circuit Breakers**

The Electrical Maintenance and Electrical Design Engineering groups at Rancho Seco reviewed this issue. Approximately \$3,000.00 was expended towards a review of plant equipment and development of a response to this issue. The District determined the subject breakers were not in use at Rancho Seco and that actions required by Bulletin 88-01 were not applicable.

**NRC Bulletin 88-02: Rapidly Propagating Fatigue Cracks In Steam Generator Tubes**

This Bulletin required action by Westinghouse plants only. At Rancho Seco the Bulletin was provided to selected departments for information only. The approximate cost of the review for this Bulletin was \$100.00.

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PDR COMMS NRCC  
CORRESPONDENCE PDR

**NRC Bulletin 88-05: Nonconforming Materials Supplied By PSI or WJM**

The District used significant resources in an effort to resolve the issues and perform the required actions stated in this Bulletin. Ultimately the NRC terminated the work effort required by this Bulletin based on NUMARC Report 88-01 and individual utility responses. The District expended approximately \$125,000.00 in its effort to address the Bulletin. The amount of resources required to address this Bulletin, given the outcome, is considered excessive.

**Generic Letter 88-01: NRC Position On BWR Austenitic Stainless Steel Piping**

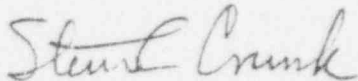
This Generic Letter was not applicable to Rancho Seco. The Generic Letter was issued to selected departments for information only. The approximate cost for the review of this Generic Letter was \$100.00.

**Generic Letter 88-03: Resolution of Generic Issue 93, "Steam Binding Of AFW Pumps"**

The Licensing and Operations Departments reviewed this Generic Letter. The District expended approximately \$650.00 towards a review of the Generic Letter and development of a response.

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

Sincerely,



Steve L. Crunk  
Manager Nuclear Licensing

cc: Paperwork Reduction Project  
Office of Management and Budget, NRC, Washington DC 20503  
G. Kalman, NRC, Rockville  
A. D'Angelo, NRC, Rancho Seco  
J. B. Martin, NRC, Walnut Creek