



SACRAMENTO MUNICIPAL UTILITY DISTRICT ☐ 6201 S Street, P.O. Box 15830, Sacramento, CA 95813; (916) 452-3211
RJR 85-517 AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

October 17, 1985

J B MARTIN REGIONAL ADMINISTRATOR
REGION V OFFICE OF INSPECTION & ENFORCEMENT
U S NUCLEAR REGULATORY COMMISSION
1450 MARIA LANE SUITE 210
WALNUT CREEK CA 94596

DOCKET 50-312
RANCHO SECO NUCLEAR GENERATING STATION
UNIT NO. 1
RESPONSE TO SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP)

The District has reviewed the SALP Board Report provided by your letter dated September 9, 1985, and discussed with you during the September 16, 1985 meeting in Walnut Creek. Your letter dated September 25, 1985, (Mr. D. F. Kirsch to Mr. R. J. Rodriguez) requested a written response. The District's comments on the SALP Board Report and responses to the Category 3 Functional Areas are provided by this letter.

The District is implementing many programatic improvements in virtually all areas of the District's nuclear operations as noted in the SALP Board Report. These improvements are the result of the District's commitment to continually improve the Rancho Seco Nuclear Generating Station Operations. The District's actions will strengthen those identified areas of weakness while continually improving other areas as well.

The District's responses to the SALP Category 3 areas are provided below:

. Radiological Controls

The District recognized the weaknesses in the area of radiological controls and implemented procedural improvements. The District retained a consultant to evaluate the radiological protection program and recommend improvements. The consultant's study consists of three phases. The first two phases are complete. The balance of the study will be completed by March, 1986. The District is implementing near-term improvements recommended by the study to date, and by other organizations, over the next three month period. The implementation of long-term improvements will be scheduled upon completion of the study. The District anticipates that the implementation of the results of this study, coupled with the District's commitment to increase supervisory involvement in plant activities, will greatly strengthen the area of radiological controls.

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The District's Quality Department has added personnel experienced in radiological controls to monitor radiological protection activities. This improved QA monitoring, in conjunction with the District's new root cause evaluation program, will help minimize the repetitive nature of occurrences in the radiological control area. These programs will also lead to continued improvements in the radiological control program.

Engineering and Construction

The District agrees that past performance in the area of engineering and construction has indicated the need for improvement. Recognizing this need, the District embarked on a program to produce an integrated system of procedures (Nuclear Engineering Procedures, NEPs) for design and construction of plant modifications. Procedure generation and revision will be ongoing activities. The initial implementation of the NEPs will be completed by January 3, 1986.

The Nuclear Engineering Department provides training on the procedures and revisions. This ensures that training is provided to the design engineering team. In addition, training has been upgraded for field engineers, craft supervision and quality control personnel.

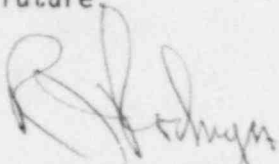
The District has established a goal to become more technically self sufficient. Additions to the technical staff are planned for the next several years. This increase in permanent District staff and corresponding decrease in contractor staff, coupled with increased control of contractor activities, should eliminate problems seen in the past with contractor control.

The District is in the process of strengthening its quality assurance and control program. The once separate Quality Control organizations have been combined and placed under the Quality Department to improve their direction and independence. A Quality Engineering group is being established to monitor design engineering activities. The Quality Assurance, Quality Engineering and Quality Control groups will provide improved monitoring of the engineering and construction activities.

The District is confident that it is taking steps that are improving the engineering and construction activities at Rancho Seco. The increased monitoring and continued management attention will ensure that improvement in the engineering and construction areas is a continuous process.

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The District is committed to improve its operation of the Rancho Seco Nuclear Generating Station. This commitment is apparent in the improvements seen in the SALP Board ratings and the ongoing District programs. The strengthening of the District's QA program and the implementation of self evaluation programs are indicative that the District's management is determined to continue improvements in the future



R. J. RODRIGUEZ
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Nuclear