



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

JUN 08 1988

GCA 88-352

Director of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, DC 20555

Docket No. 50-312  
Rancho Seco Nuclear Generating Station  
License No. DPR-54  
RESPONSE TO NOTICE OF VIOLATION 88-05

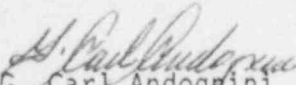
Dear Sir:

On May 13, 1988, the Sacramento Municipal Utility District received a Notice of Violation concerning activities at the Rancho Seco Nuclear Generating Station. In accordance with 10 CFR 2.201, the District provides the enclosed response to this violation.

This letter denies the violation cited, and describes the District's reasons for denial.

Members of your staff with questions requiring additional information or clarification may contact Mr. Steve Rutter at (916) 452-3211, extension 4674.

Sincerely,

  
G. Carl Andognini  
Chief Executive Officer,  
Nuclear

Attachment

cc w/atch:

J. B. Martin, NRC, Walnut Creek  
A. D'Angelo, NRC, Rancho Seco  
INPO

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PDR ADOCK 05000312  
Q ncn

RANCHO SECO NUCLEAR GENERATING STATION ☐ 14440 Twin Cities Road, Herald, CA 95638-9799; (209) 333-2935

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## RESPONSE TO NOTICE OF VIOLATION 88-05

### NRC STATEMENT OF VIOLATION A

10 CFR, Part 50, Appendix B, Criterion V, states in part that:

"Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Procedure QAP-17, titled "Nonconforming Material Control," Revision 7, states in part that:

5.1.1 "Systems, equipment and appurtenances, components, parts or material which do not meet the specified requirements of ... operational/test documents, ... shall be considered nonconforming."

Special Test Procedure 961, Loss of Offsite Power, required the "A2" emergency diesel generator to hot restart automatically when it received a Safety Features Actuation System (SFAS) start signal from the control room as part of the test.

Contrary to the above, on February 28, 1988, STP 961 was performed and the failure of the A2 diesel generator to hot start automatically when it received a SFAS start signal from the control room was not considered nonconforming.

This is a Severity Level IV violation (Supplement 1).

### DISTRICT RESPONSE

Admission or denial of alleged violation:

The District denies that the above is a violation.

On February 28, 1988, during the performance of Special Test Procedure STP.961 "Loss of Offsite Power Test," the "A2" diesel generator failed to start when it initially received a Safety Features Actuation System (SFAS) start signal. Immediate troubleshooting discovered that the pneumatic shutdown system had not reset. The pneumatic shutdown system was manually reset and the "A2" diesel generator started. In accordance with Administrative Procedure AP.82 "Conduct of Special Testing," this occurrence was documented as Test Deficiency No. 16.

AP.82 states:

6.3.11.2 "If a test deficiency occurs, it shall be documented either on a PICN, PTCN, WR, NCR or ODR in accordance with QAP-17 and the document number noted in the test log."

DISTRICT RESPONSE (Continued)

QAP-17 states:

5.1.1 "Systems, equipment and appurtenances, components, parts or material which do not meet the specified requirements of ... operational/test documents ... shall be considered nonconforming. Refer to Attachment 3 for guidelines on when to write NCRs."

QAP-17, Attachment 3 states:

"If a test fails and the test results are to be submitted for review and approval with the failed step, an NCR shall be initiated to document the test failure."

The initial failure of the "A2" diesel generator was not considered a test failure since the diesel generator did start when the pneumatic shutdown system was reset.

AP.82 states:

6.3.11.3 "If a test deficiency which affects Acceptance Criteria occurs, an NCR shall be written if the intent is to accept the test results 'as-is'."

The Acceptance Criteria required the "A2" diesel to restart within 5 minutes of being stopped. Since the "A2" diesel restarted within 5 minutes, the occurrence did not affect the Acceptance Criteria; therefore, an NCR was not generated. To document the occurrence as required by AP.82, ODR 88-147 was generated. The ODR documents the occurrence as follows:

"During the performance of STP.961 Step 6.17.2.9, the TDI Diesel Generator G-100A failed to start on a LOOP/SFAS initiation signal. The cause was a failure of the pneumatic shutdown system to reset following the normal shutdown. The pneumatic logic was reset manually by an Operator as directed by the Test Engineer and the diesel started within 5 minutes of the shaft being stopped. STP.961 was then continued to Section 6.17 completion and Test Deficiency #16 was written. WR #142455 already addressed this problem and is still open awaiting parts."

RSAP-1302 "Occurrence Description Reports" states:

"This procedure describes the responsibilities for reporting and resolving any unsafe, atypical or off-normal occurrences that are related to the operation of Rancho Seco Nuclear Generating Station. These occurrences may include ... failed or unacceptable test results ..."

DISTRICT RESPONSE (Continued)

RSAP-1302 further states:

1.2.3 "Notify the responsible organization of occurrences and track their correction."

Based on the above procedural requirements, and the fact that an ODR was written and all other procedural requirements were met, the District feels that the occurrence was adequately documented and denies the alleged violation.