



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

JUN 21 1988

CEO 88-003

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 88-12

Dear Sir:

By letter dated May 23, 1988, the Sacramento Municipal Utility District received a Notice of Violation concerning the failure to report an automatic actuation of an ESF System within 4 hours as required by 10 CFR 50.72(b)(2)(ii). In accordance with 10 CFR 2.201, the District provides the enclosed response to the violation.

This letter acknowledges the violation as cited and describes the District's corrective actions.

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

Sincerely,

Joseph F. Firlit  
Chief Executive Officer,  
Nuclear

Attachment

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

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## DISTRICT RESPONSE TO NOTICE OF VIOLATION 88-12

### NRC STATEMENT OF VIOLATION

During an NRC inspection conducted on March 30 through May 2, 1988 a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR 50.72(b)(2)(ii) states, in part:

"(b) Non-emergency events - ....

(2) Four-hour reports. ...the licensee shall notify the NRC as soon as practical and in all cases, within four hours of the occurrence of any of the following:

(ii) Any event or condition that results in manual or automatic actuation of any Engineered Safety Feature (ESF)...."

Contrary to the above on April 11, 1988, at 2:38 p.m., the control room essential heating, ventilation and air conditioning (HVAC) system, an Engineered Safety Feature, was actuated and was not reported to the NRC within four hours.

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

### DISTRICT RESPONSE

1. Admission or denial of alleged violation:

The District acknowledges and admits that the above occurred as stated.

2. Reason for the violation:

District personnel responsible for determination of the 10 CFR 50.72 reportability did not realize that inadvertent actuation of the Control Room/Technical Support Center (CR/TSC) Essential HVAC System was reportable. The appropriate personnel were not aware of the District's determination that the CR/TSC Essential HVAC System is an Engineered Safety Features (ESF) System. The circumstances that led to the wrong conclusion on the ESF status were:

- Updated Safety Analysis Report (USAR) Chapter 6, "Safety Features" states that safety features are designed to minimize the severity and mitigate the consequences of a Loss of Coolant Accident by fulfilling the following basic functions under accident conditions:
  - A. Protect the fuel cladding
  - B. Ensure Reactor Building integrity

DISTRICT RESPONSE (Continued)

C. Reduce the driving force for building leakage

D. Remove fission products from the Reactor Building atmosphere

None of the above functions require the CR/TSC Essential HVAC to be an ESF System; however, the system was designed and built to meet the requirements of an ESF System per Regulatory Guide 1.70, Revision 3.

- The CR/TSC Essential HVAC System was removed from Safety Features Actuation System (SFAS) signal as part of a plant modification.
- The CR/TSC Essential HVAC System was in a "testing" status between July 30, 1986 and February 27, 1988 (i.e., inadvertent actuations that occurred during this period were not reportable).

3. Corrective actions and results achieved:

"Red phone" notifications were made to the NRC at 1200 hours on April 14, 1988, at 1249 hours on April 18, 1988, and at 2250 hours on May 6, 1988. The District submitted LER 88-06 identifying 50 spurious actuations of the CR/TSC Essential HVAC System between March 16 and May 6, 1988. This LER detailed corrective actions taken and planned to prevent future inadvertent actuations.

4. Corrective actions to be taken to avoid further violations:

Administrative Procedure AP 23.08 "Reporting/Notification" shall be revised to include 10 CFR 50.72 reporting responsibility, a reportability matrix, specific criteria, time constraints, action steps, and applicable forms. This procedure shall be revised by September 9, 1988.

The Nuclear Engineering Department will conduct an assessment of all plant systems to confirm the District's understanding of which systems are ESF. This assessment will review the present definition in the USAR against the latest recommendations in Regulatory Guide 1.70, Revision 3. Included in this assessment will be an evaluation of the CR/TSC Essential HVAC System to determine if it is actually required to be designated an ESF System. This assessment will be completed by December 31, 1988.

5. Date when full compliance was achieved:

Full compliance was achieved on May 12, 1988, with the submittal of Licensee Event Report 88-06, "Spurious Actuation of Control Room/Technical Support Center Essential HVAC," which reported 50 unplanned actuations.