



SACRAMENTO MUNICIPAL UTILITY DISTRICT 6201 S Street, P.O. Box 15830, Sacramento CA 95852-1930, (916) 452-3211
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

JEW 86-01

June 13, 1986

DIRECTOR OF NUCLEAR REACTOR REGULATION
ATTENTION FRANK J MIRAGLIA
DIRECTOR PWR-B DIVISION
U S NUCLEAR REGULATORY COMMISSION
WASHINGTON DC 20555

DOCKET NO. 50-312
LICENSE NO. DPR-54
PROPOSED AMENDMENT NO. 148

In accordance with 10 CFR 50.90, the Sacramento Municipal Utility District proposes to amend its Operating License DPR-54 for Rancho Seco Nuclear Generating Station Unit No. 1.

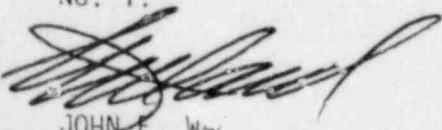
Proposed Amendment No. 148 revises Specification 4.8.1A of the Rancho Seco Technical Specifications to permit system testing of the auxiliary feedwater pump under conditions of either power operation or plant shutdown. Presently, this system testing is limited to shutdown.

Details of the proposed amendment are provided in Attachments I, II and III, which are the Safety Analysis, "No Significant Hazards" Evaluation and Description of Proposed Changes, respectively.

Pursuant to 10 CFR 50.91(b)(1), the Radiological Health Branch of the California State Department of Health Services has been informed of this proposed amendment by mailed copy of this submittal.

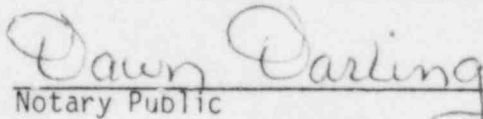
Enclosed is a check in the amount of \$150.00 as required by 10CFR 170.21, "Schedule of Fees."

Should you require any further information with respect to this proposed amendment, please contact Mr. Ron W. Colombo at Rancho Seco Nuclear Generating Station Unit No. 1.


JOHN E. Wini
ASSISTANT GENERAL MANAGER,
NUCLEAR

Attachments (3)

Subscribed and sworn to before me
this 13th day of June, 1986.


Notary Public



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Rec'd w/ check

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ATTACHMENT I
SAFETY ANALYSIS

Specification 4.8.1A presently requires that the periodic system testing of the auxiliary feedwater pump be performed "at least once per 18 months during a shutdown."

Proposed Amendment No. 148 deletes the words "during a shutdown" from Specification 4.8.1A. This change will result in the following benefits without affecting the safety of the plant:

- a. Allows system testing under the authentic conditions of actual power operation.
- b. Allows system testing during plant shutdown when circumstances (e.g., post-maintenance, 18 month deadline) warrant.
- c. Precludes the necessity of plant shutdown for the sole purpose of performing the test.

Although periodic testing of the auxiliary feedwater pump can be performed under conditions of either plant operation or shutdown, system design makes testing during plant operation the more convenient. The reason for this is that by design the auto-start of an auxiliary feedwater pump on loss of main feedwater flow is initiated by the loss of main feedwater pump discharge pressure sensed by pressure switches at the auxiliary feedwater pumps. During plant operation, testing for automatic startup of an auxiliary feedwater pump on loss of main feedwater flow is achieved by simply isolating the main feedwater pump discharge pressure to the auxiliary feedwater pump pressure switch and bleeding off the sensing line. However, during plant shutdown, there is no main feedwater pump discharge pressure available. Because of this, the loss of main feedwater flow must be simulated by isolating the pressure switch, pressurizing it with a temporary pressure source, and then bleeding it off. From the foregoing it can be seen that periodic testing of the auxiliary feedwater pump during plant operation is more convenient, and thus preferred.

The proposed change is judged to have no effect on plant safety since the required system testing will either be done under the plant conditions for which operation of the auxiliary feedwater pump system is designed, or by simulation of operating plant conditions where necessary when shutdown.

ATTACHMENT II

"NO SIGNIFICANT HAZARDS" EVALUATION

Proposed Amendment No. 148 deletes the words "during a shutdown" from the system testing requirement in Specification 4.8.1A for the auxiliary feedwater pumps. This change results in the benefit of being able to perform the system test under the authentic condition of actual operation (the actual mode in which the auxiliary feedwater pump must be operable), while also allowing the test to be performed during shutdown when the test schedule coincides with that plant condition.

The District has reviewed the proposed change against each of the criterion of 10 CFR 50.92 and concluded that plant operation with the added convenience of performing the system test of the auxiliary feedwater pump during either plant operation or shutdown would not:

- a. involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change provides for conducting the system test either during plant operation or during shutdown. Neither of these conditions are seen to affect the probability or consequences of an accident since both conditions are in accord with system design,
- b. create the possibility of a new or different kind of accident from any previously analyzed. The proposed change to Specification 4.8.1A does not involve a change in design or in the methods of plant operation. For this reason, the proposed change is not seen to be creating the possibility of a new or different kind of accident from any previously evaluated,
- c. involve a significant reduction in a margin of safety. As stated above, the proposed change to Specification 4.8.1A does not involve a change in design or in plant operation. Accordingly, a reduction in a margin of safety is not evident.

Based on the considerations discussed above, the District has concluded that: 1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and 2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.