



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

GCA 87-030

MAY 14 1987

Director of Nuclear Reactor Regulation
Attn: Frank J. Miraglia
Director PWR-B Division
U S Nuclear Regulatory Commission
Washington, DC 20555

Docket No. 50-312
Rancho Seco Nuclear Generating Station
License No. DPR-54
PROPOSED AMENDMENT NO. 111, REV. 1

Dear Mr. Miraglia:

Proposed Amendment No. 111, submitted to the NRC on February 28, 1986, revised Table 3.6-1, Safety Features Containment Isolation Valves incorporating 16 additional valves and increasing the maximum closure time of certain of the containment isolation valves to 25 seconds. In a subsequent telephone conversation (S. Miner, NRC to R. Colombo, SMUD), the NRC requested that SMUD reevaluate the effect of containment purging coincident with a LOCA using TID source terms instead of reactor coolant inventory terms.

The District has reviewed the licensing criteria for containment purging coincident with a LOCA and notes the following in Branch Technical Position CSB 6-4, Section B.5.a:

The source terms used in the radiological calculations should be based on a calculation under the terms of (10 CFR 50), Appendix K, to determine the extent of fuel failure and the concomitant release of fission products, and the fission product activity in the primary coolant. A pre-existing iodine spike should be considered in determining primary coolant activity.

District interpretation of this BTP passage and its reference to 10 CFR 50, Appendix K indicates that the modeling of the release of radioactivity to the containment environment need not be instantaneous, as would be assumed with the use of TID source terms during the first few minutes of a LOCA. Therefore, it is concluded that the release of radioactivity to the containment environment should be time-dependent, not instantaneous.

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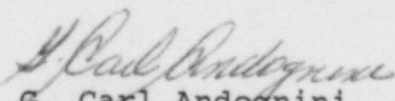
The attached Proposed Amendment No. 111, Revision 1 submits a revised Safety Analysis (Attachment II) to further clarify the District's position of using reactor coolant inventory source terms to determine the 25 second maximum closure times of the select containment isolation valves. Additionally, Attachment III, the "No Significant Hazards" consideration is revised to better comply with 10 CFR 50.92, as clarified by Generic Letter 86-03. The remainder of Proposed Amendment No. 111, Revision 1, submitted herewith, is unchanged from the original submittal except for the deletions of Attachment III and IV, which are supplanted by the revised Safety Analysis, and reformatting of Table 3.6-1 for improved understanding of valve positioning (Attachment I).

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.

The District has determined that no license fees are required with this revision since a check for \$150.00 was sent to the Commission with the initial submittal of Proposed Amendment No. 138.

Should you require any further information concerning Proposed Amendment No. 111, Revision 1, please contact Mr. Ron W. Colombo at (916)452-3211, extension 4236.

Sincerely,

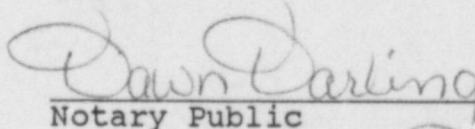


G. Carl Andognini
Chief Executive Officer, Nuclear

Attachments

cc: G. Kalman
A. D'Angelo
Region V (2)
INPO
MPIC (2)

Subscribed and sworn to before
me this 14th day of May,
1987


Notary Public