



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

GCA 87-807

DEC 10 1987

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U. S. Nuclear Regulatory Commission  
Attn: J. B. Martin, Regional Administrator  
Region V  
Office of Inspection and Enforcement  
1450 Maria Lane, Suite 210  
Walnut Creek, CA 94596

DOCKET NO. 50-312  
RANCHO SECO NUCLEAR GENERATING STATION  
LICENSE NO. DPR-54  
RESPONSE TO NOTICE OF VIOLATION 87-26

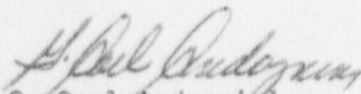
Dear Mr. Martin:

On November 18, 1987, 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 responses to this violation.

This letter acknowledges the violations cited, and describes the District's intended corrective actions.

Please contact me if you have any questions. Members of your staff with questions requiring additional information or clarification may contact Mr. Paul Lavelly at (916) 452-3211, extension 4674.

Sincerely,

  
G. Carl Andognini  
Chief Executive Officer,  
Nuclear

Attachment

cc w/atch:

G. Kalman, NRC, Bethesda (2)  
A. D'Angelo, NRC, Rancho Seco  
F. J. Miraglia, NRR, Bethesda  
INPO  
I&E

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PDR

## ATTACHMENT 1

### DISTRICT RESPONSE TO NOTICE OF VIOLATION 87-26

#### NRC STATEMENT OF VIOLATION A

Technical Specifications, Section 6.13, "High Radiation Area," states in part:

"Each High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr but less than 1,000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by issuance of a Radiation Work Permit, and any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area."

Contrary to the above, on August 16, 1987, radioactive material stored inside the reactor vessel head stand fixture located on the +40' level of the Reactor Building, producing whole body dose rates up to 500 millirem per hour (mrem/hr), was not posted as a high radiation area.

This is a Severity Level IV Violation (Supplement IV).

#### 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:

The area around the reactor headstand was posted as a contaminated area with instructions to notify Radiation Protection prior to entry. Radiation Protection did not consider the area inside the reactor headstand to be accessible because it is surrounded by a six foot wall with no door. Because the area was not considered to be accessible, routine radiation surveys were not taken and the area was not posted as a high radiation area.

3. Corrective actions taken and results achieved:

- a. The inside of the reactor headstand area was surveyed and the entrance was posted as a high radiation area.
- b. On August 26, 1987, through August 28, 1987, surveys were taken to ensure that no other accessible and unposted high radiation areas exist within the Reactor Building. None were found.

## 4. Corrective actions to avoid further violations:

- a. Actions have been initiated to define the term "accessible" and incorporate the definition into appropriate Radiation Protection procedures and training.
- b. Administrative Procedure AP.305-8A has been revised to require exit and deposing surveys upon Reactor Building closeout. These surveys will be filed in the Reactor Building Closeout file.
- c. Administrative Procedure AP.305-10 has been revised to require, as a minimum, surveys be performed in those areas identified in the previous Reactor Building Closeout file and re-establish posting per the requirements of AP.305-7.

## 5. Date when full compliance will be achieved:

Full compliance will be achieved by February 1, 1988.

NRC STATEMENT OF VIOLATION B

Technical Specifications, Section 6.11, "Radiation Protection Program" states in part:

"Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure."

Licensee Procedure AP-305-8A, "Routine and Radiation Work Permit Surveys," paragraph 6.2.4 states in part:

"In addition to other scheduled and required surveys, document changing conditions due to plant processes and addition or removal of radiation materials (Radioactive Wastes Storage; Liquid Processing Area; Waste Compactor Area) or other evolutions as soon after the change as possible. For some evolutions, this may mean performing several surveys in one day."

Contrary to the above, during the time between December 26, 1985, and August 26, 1987, radioactive materials located inside the reactor vessel head stand fixture area were not surveyed as necessary to document the changing conditions which resulted in a high radiation area not being properly posted (see item A above).

This is a Severity Level IV Violation (Supplement IV).

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:

Radiation Protection surveys are performed in accordance with Administrative Procedure AP.305-8A, "Routine and Radiation Work Permit Surveys." Routine surveys required during plant shutdown are specified in AP.305-8A Record 7.4, "Shutdown Survey Checklist" which states that all accessible work areas in the Reactor Building must be surveyed during each shift. Because Radiation Protection did not consider the inside of the reactor headstand to be an accessible work area, routine surveys had not been performed since May 1985 when work was being conducted in the area. The cause of Violation B is the same as Violation A in that the area was not considered accessible.

## 3. Corrective actions taken and results achieved:

- a. The inside of the reactor headstand area was surveyed and posted as a high radiation area.
- b. On August 26, 1987, through August 28, 1987, surveys were taken to ensure that no other accessible and unposted high radiation areas exist within the Reactor Building. None were found.

## 4. Corrective actions to avoid further violations:

- a. Actions have been initiated to define the term "accessible" and incorporate the definition into appropriate Radiation Protection procedures and training.
- b. Administrative Procedure AP.305-8A has been revised to require exit and deposing surveys upon Reactor Building closeout. These surveys will be filed in the Reactor Building Closeout file.
- c. Administrative Procedure AP.305-10 has been revised to require, as a minimum, surveys be performed in those areas identified in the previous Reactor Building Closeout file and re-establish posting per the requirements of AP.305-7.

## 5. Date when full compliance will be achieved:

Full compliance will be achieved by February 1, 1988.

NRC STATEMENT OF VIOLATION C

Technical Specifications, Table 4.19-1, Footnote 5, "Radioactive Liquid Effluent Monitoring Instrumentation," states in part:

"During periods of known activity in the regenerant tank, perform a source check daily during releases via this pathway."

Contrary to the above, daily source checks were not performed when effluent radiation monitor R15020 was operable, the regenerant holdup tanks contained known activity during the period from August 1984 through February 20, 1987, and releases were made via this pathway.

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:

The reason for the missed source check was inadequate implementation of Technical Specification Amendment No. 53. When Technical Specification Amendment No. 53 was approved and incorporated into site procedures, the requirement in Technical Specification Table 4.19-1, Footnote 5, was not incorporated into the appropriate surveillance procedure.

## 3. Corrective actions taken and results achieved:

A temporary change to Surveillance Procedure SP 200.02, "Instrumentation Surveillance Performed Each Day" was made on September 14, 1987, to incorporate the Technical Specification required source check for monitor R15020.

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

Technical Specification Proposed Amendment No. 155 changes the monitor associated with Technical Specification Table 4.19-1 from R15020 to R15017A. R15017A monitors the effluent discharged from the retention basin. Proposed Amendment No. 155 requires that a source check be performed on R15017A prior to any release from the retention basin. The source check requirement for monitor R15017A will be incorporated into the appropriate surveillance procedure.

## 5. Date when full compliance will be achieved:

Revision 0 to Technical Specification Proposed Amendment No. 155 was submitted to the NRC on June 30, 1987. Revision 1 was submitted on October 3, 1987.

Full compliance with Technical Specification Table 4.19-1, Footnote 5 (Amendment No. 53) was achieved on September 14, 1987, with the issuance of Temporary Change to SP 200.02. Full compliance with Technical Specification Table 4.19-1 (Amendment No. 155) will be achieved upon NRC approval of Technical Specification Proposed Amendment No. 155 and approval of the surveillance procedure. The surveillance procedure should be approved by January 15, 1988.