



SMUD

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

NQA 99-137

November 30, 1999

U.S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, DC 20555

Docket No. 72-11
Rancho Seco Independent Spent Fuel Storage Installation
Rancho Seco Independent Spent Fuel Storage Installation Physical Protection Plan

Attention: Randy Hall

In SMUD letter MPC&D 99-142, dated October 6, 1999, we transmitted the Rancho Seco ISFSI Physical Protection Plan (PPP), Amendment 0, and the Training and Qualification Plan (T&QP), Revision 0 to the NRC for approval. Based on subsequent discussions with the NRC, on November 2, 1999, we submitted SMUD letter MPC&D 99-163 that included replacement pages to the PPP and T&QP providing the additional information and clarification requested.

The ISFSI PPP and T&QP describe the security provisions for protecting Rancho Seco's spent fuel after placing the fuel into dry storage at the ISFSI. We developed the PPP and T&QP in accordance with the guidance in NUREG-1619, 10 CFR 73.51, 10 CFR 72 Subpart H, and the applicable portions of 10 CFR 73 and 10 CFR 73 Appendix B.

The 10 CFR 72 and 10 CFR 50.54(p) analyses for the ISFSI PPP and T&QP concluded that the addition of the ISFSI does not reduce the effectiveness of the current security plan. Because the ISFSI will be within the Industrial Area, it will not affect any previously evaluated contingencies and will not reduce the ability to respond to Spent Fuel Building contingencies.

UFCO

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If you, or members of your staff, have questions requiring additional information or clarification, please contact Bob Jones at (916) 732-4843.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Delezenski", with a long, sweeping horizontal line extending to the right.

Jerry Delezenski
Superintendent, Quality/Licensing/Admin.