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SACRAMENTO MUNICIPAL UTILITY DISTRICT ☐ 6201 S Street, P.O. Box 15830, Sacramento, CA 95813; (916) 452-3211
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

RJR 85-269

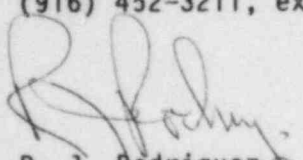
May 23, 1985

DIRECTOR OF NUCLEAR REACTOR REGULATION
ATTENTION HUGH L. THOMPSON, JR. DIRECTOR
DIVISION OF LICENSING
U S NUCLEAR REGULATORY COMMISSION
WASHINGTON D C 20555

DOCKET 50-312
RANCHO SECO NUCLEAR GENERATING STATION
UNIT NO 1
GENERIC LETTER 83-28, REQUEST FOR ADDITIONAL INFORMATION

Your letter, dated March 28, 1985, requested additional information to complete your review of the District's November 4, 1983 (RJR 83-725) response to Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events". Attached is our response to your information request.

If you have any questions feel free to contact Robert Roehler of my staff at (916) 452-3211, extension 4905.


R. J. Rodriguez
Assistant General Manager,
Nuclear

Attachment

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ATTACHMENT

NRC Request:

Item 2.1 (Part 1) - Incomplete.

A listing of RTS components reviewed, due 10/1/84, has not been received. A specific statement confirming that these components (RTS) are identified as safety-related on documents, procedures, drawings and information handling systems is needed.

Response:

The District's October 5, 1984 submittal (RJR 84-441) updated the schedule for completing our RTS component review. Our new schedule indicated that this review would be completed by February 1, 1985.

We have completed this review and the components listed are identified as safety related (Class 1) on the Master Equipment List (MEL). The MEL is the QA list for equipment/components. The handling of components in documents, procedures, drawings and information handling systems is based on the MEL classification of the component. As discussed in our November 4, 1983 submittal, Item 2.2, the Maintenance Information Management System (MIMS), which includes the MEL, identifies the procedures, drawings, and documents for components and controls all work on the components.

In previous conversation with members of your staff, the RTS listing is not required to complete your review of this item. Your staff also agreed that our original submittal did not commit to provide this list.

NRC Request:

Item 2.1 (part 2) - Incomplete

Licensee should describe his program for periodically contacting vendors to ensure that all vendor technical information is being received, how maintenance information is developed for components whose vendors are no longer available, how maintenance and testing procedures are revised to incorporate up-to-date information, and how the performance of these procedures is controlled.

Response:

As stated in our November 4, 1983 submittal (RJR 83-725) B&W was the supplier for the RTS components. The B&WOG tasked B&W to provide a list of RTS safety related components and the most current vendor information. The District has completed its review of this information and has updated the MEL and vendor library based on this review.

The District considers that these actions complete the requirements of item 2.1 and that the programs of item 2.2 will be relied upon for maintenance of current vendor information.

NRC Request:

Item 2.2.1 - (1) Incomplete.

Quality Assurance Procedure QAP.3 which is the basis for classification was not included in Appendix A as stated.

Response:

Quality Assurance Procedure QAP.3 is attached.

NRC Request:

Item 2.2.1 - (4) Incomplete.

Response should include information on corrective action that will be taken if deficiencies are found.

Response:

The corrective action to be taken is unique depending on the results of findings of a specific audit. The requirements for ensuring that adequate corrective action is taken is discussed below.

Quality Assurance Procedure QAP.19 establishes and defines the program for auditing the operation, maintenance, repair and modification of Rancho Seco. The procedure requires prompt corrective action and followup audits to determine the adequacy and effectiveness of the corrective actions taken.

Quality Control Instruction QCI.2 provides the instructions for the audit program. The audited group is responsible for determining corrective action to be taken to resolve any nonconformances identified by QA audits. QA and the Management Safety Review Committee (MSRC) followup is required to ensure that prompt corrective action is made and that the resolution or corrective action is acceptable.

Copies of QAP.19 and QCI.2 are attached for your information.

NRC Request:

Item 2.2.2. - Incomplete.

NUTAC is a generic response that will need to be supplemented by plant specific information that details how Rancho Seco will implement the NUTAC program. This information, due in May, 1984 has not been received. In addition the staff found the NUTAC program fails to address the concern about establishing and maintaining an interface between all safety-related equipment vendors and the utility. The licensee is, therefore, required to supplement his response to describe how such an interface will be developed, maintained, and the current information obtained incorporated into operating, maintenance, and test procedures.

Response:

The Vendor Equipment Technical Information Program (VETIP) as defined in the March 1984 NUTAC document is considered a valid response to section 2.2.2 of the NRC Generic Letter 83-28. The District is implementing the program as described therein. Accordingly, it is requested that the NRC reanalyze and reconsider your request for additional information.

NRC Request:

Item 3.1.3 - Incomplete.

Licensee should report the results of their review.

Response:

We have not to date identified any post maintenance test requirements in existing technical specifications that degrade rather than enhance safety. Existing procedure requirements ensure that this issue is part of our ongoing review of plant operations, configuration changes, and procedure changes.

NRC Request:

Item 3.2.3 - Incomplete.

Licensee should complete their review and report the results.

Response:

See response to item 3.1.3.

NRC Request:

Item 4.5.2 - Incomplete.

Licensee should identify and describe modifications being made to permit on-line testing.

Response:

The modification referred to is the addition of automatic actuation of the shunt trip attachment (Item 4.3), which includes on-line testability. No other modifications were necessary to permit on-line testability.

NRC Request:

Item 4.5.3 - Incomplete.

Licensee should describe the program, discuss the results, and furnish plant specific information regarding how the results will be implemented at Rancho Seco.

Response:

The B&WOG ATWS Committee Amended Response to Generic Letter 83-28 dated April 8, 1985 (J. Ted Enos to Mr. Thompson) describes the results of the evaluation undertaken to resolve this item. The results demonstrate that the current one month surveillance test interval for the Reactor Trip System is consistent with high reliability. Based on these results the District considers the one month test interval to be adequate and that the present one month test interval is consistent with achieving high reactor trip system availability.