



SACRAMENTO MUNICIPAL UTILITY DISTRICT ☐ 6201 S Street, P.O. Box 15830, Sacramento CA 95852-1830, (916) 452-3211
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

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July 17, 1985

REGION V USE

J B MARTIN, REGIONAL ADMINISTRATOR
REGION V OFFICE OF INSPECTION AND ENFORCEMENT
U S NUCLEAR REGULATORY COMMISSION
1450 MARIA LANE SUITE 210
WALNUT CREEK CA 94596

DOCKET NO. 50-312
LICENSE NO. DPR-54
NOTICE OF VIOLATION FOR IE INSPECTION 85-08

The Sacramento Municipal Utility District hereby submits in Attachment 1 to this letter a response to the subject Notice of Violation in accordance with 10 CFR 2.201.

If there are any questions concerning this response, please contact Mr. R.W. Colombo at the Rancho Seco Nuclear Generating Station.

R.J. Rodriguez
Assistant General Manager,
Nuclear

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IE-01

ATTACHMENT 1

DISTRICT RESPONSE TO IE INSPECTION 85-08 NOTICE OF VIOLATION

As a result of the inspection conducted between March 14 and May 3, 1985 by Messrs. J. Eckhardt and G. Perez, the following violations were identified. Each violation description is followed by the District's response to the violation.

- A. Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering activities including surveillance and test activities of safety related equipment. Also, Technical Specification 4.6.4 requires in part ... "Batteries in the 125 V DC systems shall be tested as follows:

...c. Each time data are recorded, new data shall be compared with old to detect signs of deterioration".

Contrary to the above requirements, the procedures for battery testing (SP 206.04, EM. 104, EM. 105, and EM. 106) contained procedural errors, incorrect data, and in some cases, the required comparison of new data to old data was not satisfactorily implemented.

DISTRICT RESPONSE

The District has reviewed the findings described above and agrees that procedures SP 206.04, EM. 104, EM. 105, and EM. 106 need to be upgraded to decrease the potential for making errors during the running of these battery tests. Each of the discrepancies noted in Section 4 of the Inspection Report will be addressed in the revisions to these procedures.

The comparison of new battery data to previous battery data, although done informally, has not been a formalized process at Rancho Seco. To address this item, the procedure revisions will include provisions for adding this comparison. Action to be taken when potential deterioration of the batteries is detected will be specified in the procedures.

In addition, two changes in the battery testing philosophy have been implemented. Maintenance engineers have replaced the electrical foreman in reviewing all procedure enclosures. This allows more time for review of the data and is accomplished by an independent reviewer. The second change has been the elimination of the requirement to copy rough data from the field onto fresh data sheets. This practice was instituted with the intention of obtaining legible data for historical files, but has too often resulted in transcription errors.

A third change in testing philosophy will be implemented in the procedure revisions. This change will eliminate the requirements for the electrician to perform calculations, whenever possible. Calculations will be made by the maintenance engineers.

The procedure revisions will be completed and full compliance achieved by October 15, 1985.

- B. Code of Federal Regulations, Part 50, Appendix B, Criteria II, Quality Assurance Program requires, in part... that the Quality Assurance "program shall be documented by written policies, procedures or instructions and shall be carried out throughout plant life in accordance with those policies, procedures, or instructions". Quality Control Instruction No. 1, Processing of Nonconforming Reports-NCRs, states "The assigned cognizant engineer is responsible for identifying on the NCR all associated drawings that must be updated as a result of disposition."

Contrary to the above, seven drawings for the Auxiliary Building HVAC System were not identified for updating on NCR 4433, Rev. 1 dated April 5, 1985.

DISTRICT RESPONSE

At the time that Quality Control Instruction No. 1 was drafted and approved, it was not realized that a large number of drawings would have to be referenced. In the case of NCR 4433, Rev. 1, ECN A-3920C was referenced. This ECN contained revisions to over 500 drawings.

Quality Control Instruction No. 1 is presently being updated to revision 3. The procedure will be revised to instruct the engineer to identify the drawing transmittal numbers or applicable ECN instead of the drawing numbers. The transmittal cover sheet and/or ECN is an auditable document.

The revision to Quality Control Instruction No. 1 will be completed by August 15, 1985 at which time full compliance will have been achieved.