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SACRAMENTO MUNICIPAL UTILITY DISTRICT ☐ 6201 S Street, P.O. Box 15830, Sacramento CA 95852-1830, (916) 452-3211
RJR 85-524 AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

October 25, 1985

DIRECTOR
OFFICE OF INSPECTION AND ENFORCEMENT
U S NUCLEAR REGULATORY COMMISSION
WASHINGTON DC 20555

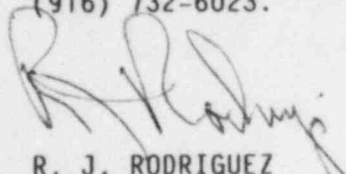
DOCKET 50-312
LICENSE NO. DPR-54
EA 85-103

On September 26, 1985, the Nuclear Regulatory Commisison, Region V, issued a Notice of Violation and Proposed Imposition of Civil Penalty to the Sacramento Municipal Utility District (the District).

Attachment 1 to this letter is the District's response to Region V concerns identified in the Notice of Violation.

The District does not protest the imposition of the civil penalty. A check in the amount of \$50,000 (fifty thousand dollars) is attached as payment of penalty.

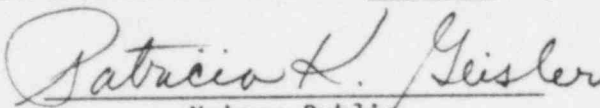
If you have any questions, please contact Rich Myers of my licensing staff at (916) 732-6023.


R. J. RODRIGUEZ
ASSISTANT GENERAL MANAGER,
NUCLEAR

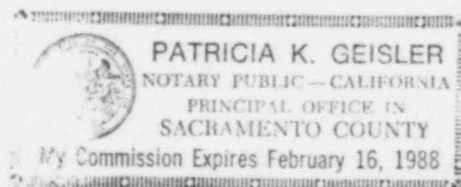
Attachments

cc: J. B. Martin, NRC, Region V

Sworn to and subscribed before me this 25th day of October, 1985.


Notary Public

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ATTACHMENT 1

RESPONSE TO NOTICE OF VIOLATION

VIOLATION A

10 CFR 50, Appendix B, Criterion III states "Measures shall be established to assure that applicable regulatory requirements and the design basis, as defined in Paragraph 50.2 and as specified in the license application, for those structures, systems, and components to which the appendix applies are correctly translated into specifications, drawings, procedures and instructions."

10 CFR 50, Appendix B, Criterion V requires that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Contrary to the above, in 1974, the design basis for the Quality Class I, Seismic Class I portion of the nitrogen supply and reactor coolant vent systems which connect to a one inch reactor coolant system vent located on the high point of the "B" hot leg was not correctly translated into design specifications and drawings in that the drawings and design specifications provided inadequate support for the nitrogen supply and vent header system. On October 7, 1981, after reanalysis of the design basis of the system, Bechtel Power Corporation advised the licensee that a spool piece should be put in during plant operations and that additional supports should be added to the "B" vent and purge line system. When the licensee went to make modifications to the system in 1983, although the drawings required installation of the spool piece, the Engineering Change Notice for the modifications did not require its installation and the piece was not installed. These deficiencies resulted in a 17 gallon per minute non-isolable primary coolant leak on June 23, 1985.

DISTRICT RESPONSE TO VIOLATION A

Admission Or Denial Of The Alleged Violation

The District agrees that the violation occurred as stated and does not protest the imposition of civil penalty.

Reasons For The Violation

The District has determined the root cause of Violation A to be a breakdown in the control of plant configuration changes. This breakdown applied primarily to design activities. In addition, insufficient construction practices and inspection activities were secondary contributors to this event.

Corrective Steps Which Have Been Taken And Results Achieved

The appropriate design drawings have been corrected to show the spool piece and appropriate pipe supports. These items have been properly installed and inspected. In addition, repairs and inspections have been completed to restore, and assure, the integrity of associated piping.

Corrective Steps Which Will Be Taken To Avoid Further Violations

The District is currently reviewing and revising its design, construction, and inspection procedures to ensure that the modification process is adequately addressed. The District recognizes that procedures alone do not assure compliance. Therefore, additional training has been provided to design personnel on the proper use of applicable procedures to ensure their awareness of design and configuration control requirements.

Date When Full Compliance Will Be Achieved

The review and revision of procedures and associated training is a continuing process. The District, however, believes that full compliance with respect to this violation has been achieved with the completion of repairs to the "B" high point vent system.

VIOLATION B

10 CFR 50, Appendix B, Criterion V requires that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

1. Contrary to the above, the design drawings referenced in Engineering Change Notice ECN-A-2934 issued in 1983 for the construction of the reactor coolant systems three-fourth inch high point vent lines on the "A" and "B" loops specified that seismic supports shall be in place between two specific valves used for system isolation. However, these supports were not installed in accordance with ECN-A-2934 as required, as was discovered in a June 1985 post I&E Bulletin 79-14 walkdown of the system, which resulted in the code allowable limits for a seismic design basis event being exceeded.
2. Contrary to the above, as of July 1985, about 223 other safety-related supports (identified in the licensee's August 6, 1985 letter) were not installed in accordance with instructions, procedures or drawings.

DISTRICT RESPONSE TO VIOLATION B

Admission Or Denial Of The Alleged Violation

The District agrees that the violation occurred as stated and does not protest the imposition of civil penalty.

Reasons For The Violation

The District has determined that the root cause of Violation B, like Violation A, is a breakdown in the control of plant configuration changes. Specifically, insufficient construction practices and inspection activities contributed to this violation.

Corrective Steps Which Have Been Taken And The Results Achieved

1. The missing supports identified on ECN-A-2934 have been installed and inspected.
2. The District has evaluated the balance of the nonconforming supports identified during the walkdown. Many of the supports were found to be acceptable as installed. Drawing changes have been initiated to reflect the as-built condition of these supports. The other supports have been reworked and inspected to restore the desired design margins and ensure proper installation.

Corrective Steps Which Will Be Taken To Avoid Further Violations

As mentioned in the response to Violation A, the District is currently reviewing and revising its design, construction and inspection procedures to ensure that the modification process is adequately addressed. The District recognizes that procedures alone do not assure compliance. Therefore, additional training has been provided to construction and inspection personnel with respect to proper installation and inspection.

Date When Full Compliance Will Be Achieved

The review and revision of procedures and associated training is a continuing process.

The District has completed the installation of the missing supports, rework of the appropriate nonconforming supports and support installation and rework inspections. Full compliance will be achieved with completion in January, 1986 of the drawing changes to incorporate the as-built conditions of those supports found to be acceptable as installed.