



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

RJR 85-456

October 30, 1985

DIRECTOR OF NUCLEAR REACTOR REGULATION
ATTENTION HUGH L THOMPSON JR DIRECTOR
DIVISION OF LICENSING
U S NUCLEAR REGULATORY COMMISSION
WASHINGTON DC 20555

DOCKET NO. 50-312
LICENSE NO. DPR-54
PROPOSED AMENDMENT NO. 107, REPLACEMENT

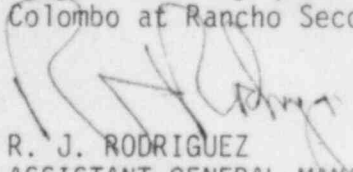
By letter dated August 16, 1985, the District submitted to the Commission Proposed Amendment No. 107. This proposed amendment revises the technical specifications defining the operability and surveillance requirements for the auxiliary feedwater system.

Per the request of Syd Miner, Rancho Seco's Project Manager, the District is resubmitting Proposed Amendment No. 107. This submittal includes specific documentation related to the mechanical and I&C portions of the AFW flow indication system. Pursuant to 10 CFR 50.91(a) of the regulations, we have provided a copy of this letter, the proposed change in technical specifications, and our analysis of significant hazards considerations to Joseph O. Ward, the designated representative of the State of California.

According to the requirements of 10 CFR 50.92, this Proposed Amendment No. 107 has been evaluated by a No Significant Hazards Consideration in Attachment I. Attachment II is a description of the proposed changes to Proposed Amendment No. 107.

Since this is a replacement to Proposed Amendment No. 107, no additional license fees are required.

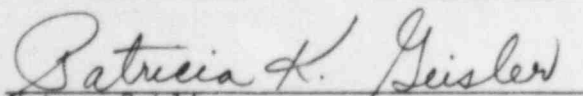
If you have any questions concerning this proposal, please contact Mr. Ron Colombo at Rancho Seco Nuclear Generating Station.

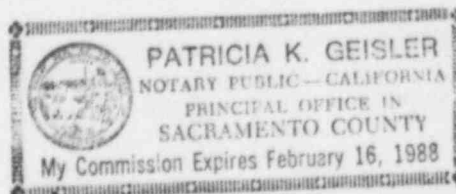

R. J. RODRIGUEZ
ASSISTANT GENERAL MANAGER,
NUCLEAR

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Enclosures 4

Subscribed and sworn to before me
this 30th day of October, 1985.


Notary Public



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ATTACHMENT I

SAFETY ANALYSIS

Proposed Amendment No.107 involves changes to Sections 3.4 and 4.8 of Rancho Seco Technical Specifications. An itemized description to the changes is included at Attachment II. Based upon the nature of the change, the list of revisions can be divided into three groups as follows:

- Group 1 - Changes 2, 6, 9
- Group 2 - Changes 1, 3, 4, 5
- Group 3 - Changes 7, 8, 10

Group 1 changes revise the AFW pump flow acceptance criteria based upon a B&W letter dated May 16, 1979. The B&W analysis determined that 760 gpm of AFW flow at 120°F is adequate to remove decay heat and RCP heat. The NRC concurred with the B&W analysis in a letter dated April 7, 1983.

Group 2 changes are the result of a new DBA being used to evaluate AFW system performance. This new DBA is reviewed in the NRC letter of April 7, 1983. Previously, a complete loss of unit AC power accident was used as the DBA. However, selection of this scenario does not account for a more demanding instance where the reactor coolant pumps could be running. Therefore, the AFW system would have to remove this additional heat input contribution. An analysis of this DBA is performed in B&W Document 32-1141727-00 which is included as Attachment III.

Group 3 consists of three (3) unrelated changes to provide additional clarification.

Change 7 removes the requirement for AFW pump flow to be measured using the change in condensate level over a finite time period. The District is currently installing a new auxiliary feedwater flow rate measuring/indication system to meet the requirements of NUREG-0737, Item II.E.1.2.2. This system is intended to become the primary means of measuring AFW flow. Technical specifications do not normally prescribe, nor should they, the exact test method to be used in conducting a required surveillance but rather allow the licensee to determine the test method based upon technical adequacy. Change 7, then allows the flexibility to use the new flow rate system as well as any other acceptable method as the circumstances may determine. Attachment IV contains copies of ECNs No. A-3094 and A-3622 which describe the mechanical and I&C portions of the new system.

Change 8 removes the phrase, "once per 18 months during a shutdown" and replaces it with "once per refueling interval."

Change 10 adds a paragraph to the Bases in order to clarify the existing AFW pump testing method.

Group 3 changes are purely administrative changes to technical specifications in order to achieve consistency, supply additional clarification, or provide a change in nomenclature.

Group 1 and Group 2 changes meet the requirements of the Standard Review Plan, Section 10.4.9.I, Items 14 and 18 respectively.

NO SIGNIFICANT HAZARDS DETERMINATION

This proposed amendment to the technical specifications consists of changes that are editorial in nature along with changes that are clearly within the acceptance criteria specified in the Standard Review Plan. Therefore, operation of Rancho Seco in accordance with this amendment:

1. Does not involve a significant increase in the probability or consequences of an accident previously evaluated,
2. does not create the possibility of a new or different kind of accident from any accident previously evaluated, and
3. does not involve a significant reduction in a margin of safety.

Accordingly, significant safety hazards are not associated with this amendment.

ATTACHMENT II

Description of Proposed Changes

1. Page 3-23, Specification 3.4.1.1; The statement that minimum feedwater flow requirements are based on a decay heat of $4\frac{1}{2}$ percent full reactor power has been removed.
2. Page 3-23, Specification 3.4.1.1; The requirement for providing a minimum amount of feedwater flow at a particular temperature has been simplified. A minimum feedwater flow requirement has been established for all cases where feedwater temperature is below 120°F.
3. Page 3-24, 3rd Paragraph of the Bases; The first two sentences have been replaced by an updated analysis bases statement.
4. Page 3-24, 4th Paragraph of the Bases; This paragraph has been changed to account for a new Design Bases Accident.
5. Page 3-24, References; FSAR paragraph 14.1.2.8.4 has been deleted because it refers to an outdated DBA.
6. Page 4-39, Specification 4.8.2; Acceptance Criteria for minimum AFW flow has been changed to 760 gpm.
7. Page 4-39, Specification 4.8.1; The statement requiring that pump flow rates be determined from the difference in condensate tank level has been removed.
8. Page 4-39, Specification 4.8.2; The statement once per 18 months during a shutdown has been changed to once per refueling interval.
9. Page 4-39a, 3rd Paragraph of the Bases; Minimum acceptable AFW pump flow requirements have been revised to 760 gpm.
10. Page 4-39a, Last Paragraph of the Bases; This paragraph has been added in order to clarify the existing AFW pump testing method.