



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 85-406

August 16, 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

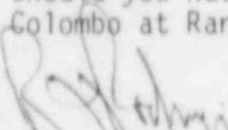
In accordance with 10 CFR 50.59, the Sacramento Municipal Utility District hereby proposes to amend its Operating License DPR-54 for Rancho Seco Nuclear Generating Station Unit No. 1. Per the requirements of 10 CFR 50.92, this Proposed Amendment 107 has been evaluated by a No Significant Hazards Consideration in Attachment 1.

This proposed amendment revises the Technical Specifications defining the operability and surveillance requirements for the Auxiliary Feedwater System. The majority of these changes are in response to an NRC letter dated April 7, 1983.

Attachment II to this submittal is a description of the proposed changes for Proposed Amendment 107.

Enclosed is a check for \$150.00 as required by 10 CFR 170.21, "Statement of Fees."

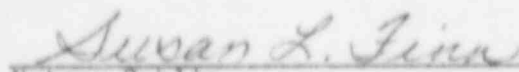
Should you have any questions concerning this proposal, please contact Mr. Ron Colombo at Rancho Seco Nuclear Generating Station.

  
R. J. RODRIGUEZ  
ASSISTANT GENERAL MANAGER,  
NUCLEAR

Enclosures 3

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Subscribed and sworn to before me  
this 16th day of August, 1985

  
Notary Public



## ATTACHMENT I

### NO SIGNIFICANT HAZARDS EVALUATION FOR PROPOSED AMENDMENT 107

#### Description of Amendment Request

Proposed Amendment No. 107 involves changes to Sections 3.4 and 4.8 of Rancho Seco Technical Specifications. An itemized description of the changes is included as 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 an attachment.

Change 7 removes the requirement that AFW pump flow be measured from the difference in condensate tank level. It is the position of the District that technical specifications should not prescribe surveillance test measurement methods. Rancho Seco Technical Specifications do not normally dictate test methods and this change has been requested in order to achieve consistency as well as allow the District the flexibility to implement improved flow rate measuring techniques. For instance, the District is currently installing auxiliary feedwater flow rate indications in order to meet the requirements of NUREG 0730, Item II.E.1.2.2. This system improvement will eventually replace the original technique for measuring AFW pump flow rates. Attached are ECN No. A-3094 and ECN No. A-3622 which describes the mechanical and I&C portions of the system modification.

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.

#### BASES FOR NO SIGNIFICANT HAZARDS CONSIDERATION

##### Determination

The Commission has provided guidance concerning the application of the standards for making a "No Significant Hazards Consideration" determination by providing certain examples (48FR14870). The District has reviewed these proposed changes with respect to the examples given and finds that the requested changes fall in the category of Commission examples.

- (i) "A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature."
- (ii) "A change which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan: for example, a change resulting from the application of a small refinement of a previously used calculational model or design method."

Example (i) is valid for Group 1 changes since they are editorial in nature, and specifically, Change 7 addresses consistency in technical specifications. Example (ii) applies to Group 1 and Group 2 changes. Group 1 and Group 2 changes meet the requirements of the Standard Review Plan, Section 10.4.9.I, Items 14 and 8 respectively.

## 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.