



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 86-01

January 3, 1986

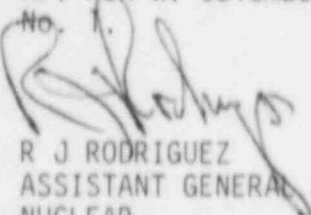
J B MARTIN REGIONAL ADMINISTRATOR
REGION V OFFICE OF INSPECTION AND ENFORCEMENT
U S NUCLEAR REGULATORY COMMISSION
1450 MARIA LANE SUITE 210
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DOCKET NO. 50-312
LICENSE NO. DPR-54
NRC INSPECTION 85-28

In accordance with 10 CFR 2.201, the Sacramento Municipal Utility District hereby submits in Attachments I and II to this letter, responses to the Notice of Violation and Notice of Deviation reported in the subject inspection.

If there are any questions concerning these responses, please contact Mr. Ron W. Colombo at the Rancho Seco Nuclear Generating Station Unit

No. 1.


R J RODRIGUEZ
ASSISTANT GENERAL MANAGER,
NUCLEAR

Attachments

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ATTACHMENT I

DISTRICT RESPONSE TO NRC INSPECTION 85-28 NOTICE OF VIOLATION

As a result of the inspection conducted during the periods of September 23-27, 1985, and October 7-15, 1985, and subsequent telephone discussions with Rancho Seco plant personnel, the following violations were identified. The District's response to the violation follows each violation description.

- A. Technical Specifications, Section 6.11, "Radiation Protection Program" states in part: "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving radiation exposure." The following procedures established pursuant to Technical Specifications, Section 6.11 state in part:
- 1) "That workers are responsible for obeying posted, oral, and written radiation protection instructions and procedures, including instructions on RWPs (Procedure AP-305, Article 2, "Responsibility of Workers").
 - 2) It is the responsibility of all personnel utilizing an RWP to familiarize themselves with the radiological conditions listed, protective clothing and dosimetry required, and any special instructions. Each RWP user will complete his own individual items as Name, Initials, Date, and Badge No. Individual completion of these items constitutes acknowledgement of the conditions and requirements as listed" (Procedure AP-305-4, "Radiation Work Permits, paragraph 3.2.3.5").
 - 3) "A dosimeter must be worn by anyone when entering Controlled Areas if it is required by the RWP" (Procedure AP 305-3, "Direct Reading Pocket Dosimeter Assignment and Use")."

Contrary to the above requirement, radiation protection procedures were not adhered to as observed by the inspector on:

- 1) September 25, 1985, when an auxiliary operator did not wear the pocket ionization chamber nor the same protective clothing required by RWP 85-743 while working on the resin transfer solidification pad,
- 2) September 26, 1985, when a utility worker did not wear the protective clothing cloth hood required by RWP 85-743 while working on the resin transfer solidification pad and,
- 3) October 9, 1985, when a security guard did not wear the protective shoe covers required by RWP 85-738 while on the -20 foot level of the auxiliary building.

DISTRICT RESPONSE:

For each of the three (3) radiation protection procedure violations cited, the appropriate department supervisor of the individual involved was tasked with determining and administering the necessary corrective action. In each case the

supervisors met with the individuals to review the circumstances leading to the violations. As a result of these meetings, disciplinary letters were written by two (2) of the supervisors and placed in the files of the involved individuals. The third violation was determined to have been an oversight on the part of the individual and no further action was taken. In addition, on December 9, 1985, the Manager, Nuclear Plant directed a memorandum to all Rancho Seco employees describing the violations and stressing the importance of each employee's strict adherence to the radiation protection procedures.

The Chemistry and Radiation Protection Department reviewed the three (3) incidents to determine if the violations occurred as a result of programmatic deficiencies in the existing Radiological Protection Program. The evaluation made by the department indicated that no programmatic changes were required.

The evaluation was completed and full compliance achieved on October 31, 1985.

B. Technical Specifications, Section 4.20, "Radioactive Gaseous Effluent Monitoring Instrumentation," Table 4.20-1 requires Instrument Channel Calibrations of the reactor building purge vent and auxiliary building stack monitors sampler flow rate devices be accomplished bi-yearly (BY). Technical Specifications, Section 1.5.4, "Instrument Channel Calibration" defines a channel calibration as follows:

"An instrument channel calibration is a test, and adjustment (if necessary), to establish that the channel output responds with acceptable range and accuracy to known values of the parameter which the channel measures or an accurate simulation of these values. Calibration shall encompass the entire channel, including equipment actuation, alarm, or trip and shall be deemed to include the channel test."

Contrary to the above, on September 27, 1985, the inspector observed that the reactor building purge vent and auxiliary building stack radioactivity monitoring systems sampler flow rate measurement devices were not calibrated in that the test performed on June 24, 1985, did not quantitatively compare the measured flow rate by the devices to known flow rate values.

DISTRICT RESPONSE:

The District has reviewed the violation and agrees that the sample flow rate measurement devices for the reactor building purge vent and auxiliary building stack radioactivity monitoring systems have not received channel calibration using a comparison check. This bi-yearly surveillance requirement first appeared in the Radiological Effluent Technical Specifications (RETS) amendment dated February 22, 1984. The effective date of this amendment was 150 days later (July 15, 1984).

The failure to implement the calibration procedure was an oversight in implementing RETS. The District performed two independent audits of RETS implementation--one by a consultant and another by the Quality Assurance Department--to assure full RETS implementation; however, this item was missed by both audits.

The District is developing the calibration procedure and identifying the special test equipment which may be required and will be in compliance with the calibration requirement by March 15, 1986.

ATTACHMENT II

DISTRICT RESPONSE TO INSPECTION 85-28 NOTICE OF DEVIATION

Listed below are the deviations identified during NRC Inspection 85-28 and the District response to each deviation.

A. In your letter RJR 83-512 of June 17, 1983 you stated:

"The District will commit to provide refresher training involving use of the PASS equipment for a sufficient number of designated equipment users to insure the availability of trained personnel to support post-accident sampling requirements. The frequency of such testing training will be every six months \pm 25%.

Contrary to the above, training and/or refresher training of users involving the use of the PASS equipment has not been provided since April 1984.

DISTRICT RESPONSE:

The District agrees that there has not been a formal refresher training program involving the use of the PASS equipment. There always have been, however, at least three individuals who were qualified and capable of operating PASS due to their day-to-day involvement with the equipment. The following is the present status of formal PASS refresher training:

1. Training on the basis and theory of the PASS system has been developed and presented to 80% of the potential PASS users.
2. Training on operation of the modified system is being developed and will be presented after the PASS modifications are completed.
3. A schedule for PASS training is being developed by Nuclear Training and will be available by February 1, 1986.

The District has investigated how this commitment was missed and found that the District's June 17, 1985 commitment letter was inadvertently not placed on the Coordinated Commitment List (CCL). The method of assuring all necessary items are placed on the CCL has been reviewed and is being improved.

B. In your letter RJR 84-343 of August 30, 1984 you stated: "...The District will submit a schedule by October 26, 1984, for either an in-house design and fabrication or the procurement of vendor supplied shields to be at the Rancho Seco site."

Contrary to the above, as of the time of this inspection, on September 27, 1985, a schedule for either procurement or designing and fabrication of the shields had not been made or determined.

DISTRICT RESPONSE:

Regarding the deviation described above, the following corrective actions have been initiated:

1. The District has issued a contract to General Atomics (GA) for providing analysis on back-up grab samples. The contract is expected to become effective by January 6, 1986.
2. The District has entered into an agreement with Southern California Edison (SCE) whereby the District will share NuPac PAS-2 transportation and sample casks with SCE for accident conditions. The District has an existing contract with Tri-State Motor Company for transportation of these casks.
3. A design change to relocate the sample taps (liquid and atmosphere grab samples) from the present location to the decontamination room is in progress. The relocation is expected to be completed by January 8, 1986.

C. In your letter RJR 85-343 of August 30, 1984 you stated in Section III(i):

"...All three of the above procedures will be reworked to address the recovery of the particulate and iodine media for transport to the analysis station under normal and accident conditions of low and high activity, respectively. The District proposes the proper completion of the three procedures by October 12, 1984."

Contrary to the above, as of the date of this inspection, September 27, 1985, procedures AP.305-24, "Reactor Building Air and Stack Samples," AP.306-26, "Auxiliary Building Air and Stack Samples" and AP.305-29, "Radwaste Service Area Vent Samples" do not address the recovery of particulate and iodine media for transport to the analysis station under accident conditions of high activity.

DISTRICT RESPONSE:

A procedure is being written to address the recovery of particulate and iodine media samples and their transport for analysis under accident conditions of high activity. This procedure will be completed and Plant Review Committee approval obtained by January 6, 1986.

- D. In your letter RJR 84-343 of August 30, 1984, you stated in Section II(f), "...At any rate, the district should be able to complete this research and development process and finish the installation of remote adjustment capability by September 28, 1984."

Contrary to the above, as of September 27, 1985, the installation of the remote adjustment capability had not started.

DISTRICT RESPONSE:

The engineering for the relocation of the conductivity bridge has been completed and the resulting design package (ECN A-5735) will be released by January 31, 1986. ECN A-5735 will accomplish the following tasks:

1. Replace existing Dionex Program Controller with a new manual control panel.
2. Relocate eluent bags, pumps, and standard solutions from the Sample Collection and Analysis Station (SCAS) Panel to the PASS Control Panel area.
3. Install two (2) new conductivity meters and a 2-channel recorder near PASS Control Panel H4ESA.
4. Locate a new panel in the existing Ion Chromatograph (IC) Cabinet to include two (2) parallel IC channels and two (2) conductivity cells.

ECN A-5735 is scheduled to be completed by May 30, 1986.