



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

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U. S. Nuclear Regulatory Commission
Attn: J. B. Martin, Regional Administrator
Region V
Office of Inspection and Enforcement
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Docket No. 50-312
Rancho Seco Nuclear Generating Station
License No. DPR-54
APPENDIX R COMPENSATORY MEASURES

Dear Mr. Martin:

As required by 10 CFR 50.48, the District completed all identified 10 CFR 50, Appendix R plant upgrades required for plants operating prior to January 1, 1979. Exceptions to these requirements have been documented and approved through the exemption process.

Two instances have recently been identified where modifications made during the current plant outage did not fully comply with Appendix R requirements. Compensatory measures will be in-place prior to leaving cold shutdown.

The first area of concern are cables in the transformer alley, fire area 70, which supplies power to control room instrument panels. A single fire in the alley could result in a loss of redundant RCS cold leg temperature, pressurizer level, and makeup tank level indications. To prevent damage to redundant trains from a single fire, cables for one train will be protected by a 3-hour fire wrap. As a compensatory measure, a continuous fire watch will be posted.

The second area of concern resulted from EFIC and other modifications and the resultant changes to personnel actions in emergency operating procedures. This change resulted in marginal lighting in certain areas where emergency lighting is required. As a compensatory measure, portable rechargeable lanterns will be staged in the plant, one (1) in the 480V west electrical switchgear room (room 217), and seven (7) in the 4160V west switchgear room (room 124). These lanterns will provide each operator a lantern for his activities required to bring the plant to a shutdown conditions. Each lantern will be checked on a

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Mr. Martin

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quarterly basis to ensure functionality, and will be stored in lockers with lead seals.

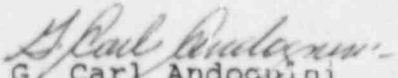
Modifications to correct these two problems are being developed and will be included in the long range schedule process (LRSL). The identified compensatory measures will remain in place pending completion of the applicable modifications.

To preclude the potential recurrence of Appendix R non-compliances resulting from design modifications, the District has implemented the following:

- 1) Enhance the design procedures to include a more rigorous Appendix R review.
- 2) Supplement the staff with permanent District personnel possessing expertise in Appendix R implementation and review.

Please contact me if you have any questions. Members of your staff with questions requiring additional information or clarification may contact Steve Crunk extension 4913.

Sincerely,


G. Carl Ando
Chief Executive Officer
Nuclear

cc:

G. Kalman, NRC, Rockville
A. D'Angelo, NRC, Rancho Seco