

Files



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MAR 29 1988

Mr. Robert D. Pollard
Union of Concerned Scientists
1616 P Street, NW
Washington, DC 20036

Dear Mr. Pollard:

We have reviewed the concerns expressed in your March 17, 1988 letter to the NRC Commissioners regarding the implementation of the Babcock and Wilcox Owners Group (B&WOG) recommendations at the Rancho Seco Nuclear Generating Station. The recommendations were developed as part of the B&WOG Safety and Performance Improvement Program (SPIP). The NRC staff is evaluating both the B&WOG Program and the implementation of the Program recommendations by the utilities. The implementation of the recommendations at Rancho Seco has received particular attention as part of the plant restart evaluation by the NRC staff. The conclusions reached by the staff, as they relate to the Rancho Seco restart evaluation, are included in Section 4.10.2 of the restart safety evaluation report, NUREG-1286, Supplement 1. An additional, more detailed discussion of these issues will be included in a forthcoming inspection report from the NRC regional office.

The SPIP was developed to accomplish two objectives: (1) reduce the number of inadvertent reactor trips, and (2) reduce the complexity of post-trip transients. Clearly, the SPIP objectives have inherent safety implications. However, the SPIP recommendations, both the total number and the "key recommendations" were developed to improve the operation of Babcock and Wilcox reactors. There was never an intent by the B&WOG nor the NRC to use the recommendations as criteria to determine whether or not a nuclear station should operate.

The restart program at Rancho Seco included a review process to evaluate whether performance improvement recommendations which were received from various sources had sufficient safety merit to: (1) be implemented prior to restart, (2) be implemented in the long term (post restart), or (3) be disregarded. The NRC staff evaluated the SMUD review process and observed the process at work. Both phases of this evaluation by the staff were completed with the conclusion that the SMUD evaluations and disposition of the performance improvement recommendations were acceptable (NUREG-1286, Supplement 1, Section 2.3).

8804050083 880329
PDR ADOCK 05000312
PDR

Your letter states that, based on a January 5, 1988 B&WOG report, only two of 203 SPIP recommendations were implemented at Rancho Seco. The SPIP is an ongoing process and since the data quoted by you was compiled, both the number of SPIP recommendations and the status of implementation at Rancho Seco has changed. According to the January 1988, Recommendation Tracking System Report from the B&WOG (report status tables included as Enclosure 1), there were 215 recommendations. Based on information provided to the Commission by the Sacramento Municipal Utility District (SMUD) during a public meeting on March 22, 1988, 169 of the 215 recommendations were determined to be applicable to Rancho Seco and 71 of these have been implemented by SMUD (SMUD implementation status slide included as Enclosure 2).

All 215 SPIP recommendations were entered into the SMUD performance improvement recommendation disposition review process and processed accordingly. The NRC staff reviewed the disposition of each SPIP recommendation which was not included in the SMUD list to implement prior to restart. The staff concurred with SMUD on the appropriateness of the conclusion for each of these recommendations. Additionally, following the receipt of your March 17, 1988 letter, the NRC Region V Administrator personally reviewed the rationale used for each of these issues. The Regional Administrator also agreed that SMUD's disposition of the SPIP recommendations was appropriate. Onsite NRC inspections audited the actual implementation of the SPIP recommendations at Rancho Seco. No discrepancies were identified in the SPIP related issues.

Your letter identified specific examples of B&WOG recommendations which you felt were safety significant but which apparently were not being implemented by SMUD prior to restart. The staff reevaluated these issues following receipt of your letter. Our conclusions following this reevaluation are summarized below.

Communication Problems: The communication problems between the control room and other parts of the plant have been evaluated by the staff. The staff has concluded that existing deficiencies in this area are not significant and should not adversely impact safe plant operations.

Inverter Overcurrent Protection: SMUD has implemented this B&WOG recommendation.

Instrumentation Power Supplies: Extensive modifications have been completed on the Rancho Seco ICS and NNI systems and their power supplies. Although additional modifications may be incorporated in the future, the systems and their associated power supplies have been evaluated in detail by the staff and found to be acceptable to support plant operations. The staff evaluation of these systems is included in Section 2.2 of NUREG-1286, Supplement 1.

Motor-Operated Valves: SMUD has completed refurbishment of motor-operated valves and the staff has verified that this work was completed.

Compressed Air Systems: Compressed air system deficiencies were identified by SMUD during the course of the performance improvement evaluations. Modifications, which included the addition of a diesel driven air compressor and backup air bottles for critical air operated components, were made to correct the identified deficiencies. The staff concluded that the modified air systems are acceptable. The staff evaluation of the compressed air systems is included in Section 3.1.2.4 of NUREG-1286, Supplement 1.

The criteria used by SMUD (as reviewed and approved by the NRC staff) for determining which recommendations need to be completed prior to restart, were not limited to deficiencies attributable directly to the December 1985 overcooling transient. The goal of the program was to identify problems, beginning with the plant design bases through management and operations, which if corrected, would improve Rancho Seco overall performance (NUREG-1286, Section 1). The B&WOG SPIP recommendations were an integral part of the evaluation but the Owners Group recommendations were not, in themselves, intended to be restart criteria.

In conclusion, your concerns for safe operations at Rancho Seco, as expressed in the letter dated March 17, 1988 were considered as part of the Rancho Seco performance improvement program as described in NUREG-1286. We have not found any new information in your letter which would alter the staff's recommendation to the Commission that Rancho Seco is ready to resume operations.

Sincerely,

Original signed by
Thomas E. Murley

Thomas E. Murley, Director
Office of Nuclear Reactor Regulation

DISTRIBUTION

DOCKET FILE

NRC & LOCAL PDR

EDG RDG. 3587

T. MURLEY/JSNIEZEK

F. MIRAGLIA

G. KALMAN

F. GILLESPIE

J. MARTIN, RV

*PREVIOUSLY CONCURRED

*PDV:PM

GKALMAN:mk

03/25/88

*PDV:PD

GKNIGHTON

03/25/88

*TECH ED

21/25/88

OGC*

RWEISSMAN

3/25/88

D. MOSSBURG (EDO #003587) w/incoming
PDV GT FILE W/INCOMING

D. CRUTCHFIELD

G. HOLAHAN

OGC/MURRAY

G. KNIGHTON

T. MARTIN, NRR

Secy 88-238

AD:DRSP35D*

GHOLAHAN

03/25/88

D:DRSP*

DCRUTCHFIELD

03/25/88

ADP
FMIRAGLIA
3/28/88

D. NRR
TMURLEY
3/29/88

TABLE 7-6
IMPLEMENTATION STATUS SUMMARY
TRIP REDUCTION RECOMMENDATIONS

Total Number in System - 215
Number Superseded/Deleted - 4
Total Number Valid - 211

	Evaluating for Applicability	Evaluating for Implementation	Implementing	Closed Operable	Closed Not Applicable	Closed Rejected	Hold	No Report	Total Valid
AFSL	68	60	11	32	32	0	0	8	211
DPCO	12	37	40	48	55	11	0	8	211
FPC	51	39	22	41	36	4	0	8	211
GPUN	50	30	38	64	20	1	0	8	211
SMUD	0	88	16	44	54	1	0	8	211
TVA,	111	23	23	12	29	1	4	8	211
TED	76	7	23	53	43	1	0	8	211

TABLE 7-7

IMPLEMENTATION STATUS SUMMARY

KEY TRIP REDUCTION RECOMMENDATIONS

Total Number in System - 74
 Number Superseded/Deleted - 4
 Total Number Valid - 70

	Evaluating for Applicability	Evaluating for Implementation	Implementing	Closed Operable	Closed Not Applicable	Closed Rejected	Hold	No Report	Total Valid
AP&L	3	40	8	18	1	0	0	0	70
DPCO	1	16	21	23	8	1	0	0	70
FPC	10	19	17	18	5	1	0	0	70
GPUN	7	12	23	24	4	0	0	0	70
SMUD	0	30	10	24	6	0	0	0	70
TVA	32	5	11	7	11	1	3	0	70
TED	24	1	16	24	5	0	0	0	70

SAFETY AND PERFORMANCE IMPROVEMENT PROGRAM (SPIP) SUMMARY

- **215 ITEMS ISSUED BY B&WOG FOR CONSIDERATION**
— 74 KEY ITEMS; 141 NON-KEY ITEMS
- **169 ITEMS APPLICABLE TO RANCHO SECO**
— 66 KEY ITEMS; 103 NON-KEY ITEMS
- **71 ITEMS ALREADY IMPLEMENTED BY RANCHO SECO**
— 36 KEY ITEMS; 35 NON-KEY ITEMS
- **29 ITEMS PARTIALLY COMPLETE**
— 19 KEY ITEMS; 10 NON-KEY ITEMS
- **69 ITEMS ARE BEING FURTHER EVALUATED FOR
IMPLEMENTATION AFTER RESTART**
— 11 KEY ITEMS; 58 NON-KEY ITEMS



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NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

ACTION

EDO PRINCIPAL CORRESPONDENCE CONTROL

FROM:

DUE:

EDO CONTROL: 003587
DOC DT: 03/17/88
FINAL REPLY:

ROBERT D. POLLARD
UNION OF CONCERNED SCIENTISTS

TO:

COMMISSIONERS

FOR SIGNATURE OF:

** GREEN **

SECY NO:

DESC:

ROUTING:

URGES THE COMMISSION NOT TO PERMIT RANCHO SECO
TO RESUME OPERATION UNTIL ALL SAFETY CHANGES
RECOMMENDED BY THE BWOG HAVE BEEN MADE

JMARTIN
MURRAY

DATE: 03/22/88

ASSIGNED TO: NRR

CONTACT: MURLEY

SPECIAL INSTRUCTIONS OR REMARKS:

FOR APPROPRIATE ACTION

NRR RECEIVED: MARCH 23, 1988
ACTION: DRSP:CRUTCHFIELD

NRR ROUTING: MURLEY/SNIEZEK
MIRAGLIA
MARTIN
GILLESPIE
MOSSBURG

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

PAPER NUMBER: CRC-88-0238 LOGGING DATE: Mar 19 88
ACTION OFFICE: EDO
AUTHOR: R.D. Pollard
AFFILIATION: UCS (UNION OF CONCERNED SCIENTISTS)
LETTER DATE: Mar 17 88 FILE CODE: ID&R-5 Rancho Seco
SUBJECT: Opposes the operation of the Rancho Seco plant
 without a demonstrable basis for finding that it
 can safely operate
ACTION: Appropriate
DISTRIBUTION: RF, Docket, Cmr's, Secy, OGC
SPECIAL HANDLING: None
NOTES:
DATE DUE:
SIGNATURE: DATE SIGNED:
AFFILIATION:

Rec'd Off. EDO

Date 3-22-88

Time 2 P.

EDO-003587