

UNION OF CONCERNED SCIENTISTS

1616 P Street, NW S.310 · Washington, DC 20036 · (202) 332-0900

March 17, 1988

Lando W. Zech, Jr., Chairman
Thomas M. Roberts
Frederick M. Bernthal
Kenneth M. Carr
Kenneth C. Rogers
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

On Tuesday, March 22, the Commission is scheduled to consider whether to permit the Rancho Seco plant to resume operation. The Union of Concerned Scientists has reviewed the publicly available documents to determine the current status at Rancho Seco of the safety improvements which were recommended by the Babcock & Wilcox Owners Group, including the recommendations made as a direct result of the accident at Rancho Seco on December 26, 1985. The B&W Owners Group's documents show that the Sacramento Municipal Utility District (SMUD) has by far the worst record of all the utilities that own B&W-designed plants in implementing the recommended safety changes.

In its most recent submittal to the NRC on January 5, 1988, the B&W Owners Group reported that SMUD has implemented only two out of 203 recommendations. This compares with a high of 52 recommendations implemented by Toledo Edison at the Davis-Besse plant. The utility closest to SMUD in the fewest number of recommendations implemented at an operating plant is Arkansas Power & Light, with 34 recommendations implemented at Arkansas Nuclear One, Unit 1. (Even TVA has implemented 12 recommendations at the Bellefonte plants which are still under construction and nowhere near operational status.)

Since the accident at Rancho Seco was largely responsible for the safety reassessment that resulted in the B&W Owners Group's recommendations, it is remarkable that SMUD stands in a class by itself with regard to its failure to make discernible progress in implementing recommendations intended to improve the safety and performance of the Rancho Seco plant. It is, of course, possible that SMUD has made more progress than is

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reflected in the January submittal to the NRC. However, you should not permit restart until you have assured yourselves and the public that the steps necessary to prevent either a recurrence of the 1985 accident or a different accident have been taken.

According to the January submittal from the B&W Owners Group, SMUD has completed its evaluation of and is in the process of implementing 127 recommendations. However, contrary to the procedure established by the B&W Owners Group, SMUD did not provide a date by which it would complete the implementation of each recommendation. For approximately 78 of these 127 recommendations, SMUD explicitly stated, however, that completion of the implementation process is "not required prior to plant restart."

In the case of the other 49 recommendations allegedly in the process of being implemented, it remains unclear whether SMUD intends to complete implementation prior to resumption of plant operation. In a few instances, SMUD reported that "completion [is] required prior to restart." But for many of these 49 recommendations, SMUD stated only that the recommendation is "scheduled for completion prior to restart" or that implementation is "to be completed prior to unit restart." Presumably, the distinction between the terminology "required prior to restart" and "scheduled for completion prior to restart" is intentional. Schedules can change, but requirements should not.

Since many of the B&W Owners Group's recommendations are lessons learned directly from the Rancho Seco accident, the Commission should require complete implementation, prior to restart, of all the safety changes recommended by the B&W Owners Group (which includes SMUD) after analyzing that accident. SMUD apparently does not intend to do so on its own.

For example, the B&W Owners Group recommended that "the review of communication problems at Rancho Seco needs to be completed and corrective actions determined and implemented at Rancho Seco to improve communication between the control room and certain plant areas." SMUD reported that it is "implementing" this recommendation, gave no schedule date for completion, but simply asserted that completion is "not required prior to plant restart." [See Recommendation No. TR-065-OPS.]

Another B&W Owners Group recommendation involves modifications needed to protect electric power supplies at Rancho Seco. The basis for the recommendation is that "the inverters at Rancho Seco will fail before the overcurrent protection interrupts power to the inverters." Thus, in the event of an electrical fault such as a short circuit, "the inverter will fail before the fuse protecting that circuit fails, an automatic transfer to another inverter will occur and the existing fault will fail that

inverter." The result would be a total loss of electric power from the inverters. Nevertheless, SMUD reported that implementation of this recommendation is "not required prior to plant restart." [See Recommendation No. TR-117-PES] We see no basis for such a conclusion.

A final example involves another recommendation to modify the power supply for the instrumentation at Rancho Seco. The B&W Owners Group stated that "this recommendation is applicable only to Rancho Seco." Nevertheless, SMUD reported that it was evaluating the recommendation to determine whether it is applicable to Rancho Seco and gave no scheduled date for completing that evaluation. [See Recommendation No. TR-192-ICS.]

In addition to requiring complete implementation of the recommendations stemming from the Rancho Seco accident before the plant is allowed to restart, the Commission should also require complete implementation of those recommendations which involve matters that should have been resolved even before Rancho Seco was licensed originally. We see no excuse, either as a legal or policy matter, to allow restart without fully implementing these needed safety changes.

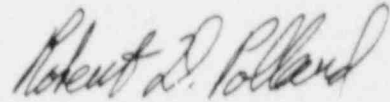
For example, the "expected benefit" of implementing Recommendation No. TR-045-MOV, which the B&W Owners Group designated as a "key" recommendation, is to ensure that motor-operated valves in safety systems "are capable of performing as required" during an accident. SMUD reported that this recommendation is "to be completed prior to plant restart." The NRC should require and verify that it has been.

Another "key" recommendation, No. TR-153-IAS, involves performing evaluations of compressed air systems. Such an evaluation is needed to ensure that, in the event of air system failures, "the core remains covered and cooled." SMUD does not say that implementation of this recommendation is "required prior to plant restart," only that it is "to be completed prior to plant restart." In any event, the NRC should require its completion and review SMUD's evaluation to determine whether it is valid prior to plant restart.

In an August 27, 1987, letter to the B&W Owners Group, the NRC staff stated that it intended to audit certain aspects of the B&W Owners Groups Safety and Performance Improvement Program. Specifically, the NRC staff said it would audit the "disposition" and "the implementation of the recommendations on a plant-specific basis." If such an inspection has been done for Rancho Seco, it should be made public so that a meaningful review of the safety status of the plant can be conducted by both the Commission and the public. If such an inspection has not been done, one should be completed and disclosed prior to authorizing operation of Rancho Seco.

The Rancho Seco plant has not operated for the past 27 months because the accident which occurred there in December, 1985, involving over eleven malfunctions and safety problems in less than an hour, was extremely serious. The plant cannot be permitted to resume operation without a demonstrable basis for finding that it can and will be safely operated.

Sincerely,

A handwritten signature in cursive script, reading "Robert D. Pollard".

Robert D. Pollard
Nuclear Safety Engineer