

April 19, 2000

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: **Docket Nos. 50-361 and 50-362**
Completion of Commitments for Generic Letter 96-06:
"Assurance of Equipment Operability and Containment
Integrity During Design-Basis Accident Conditions"
San Onofre Nuclear Generating Station Units 2 and 3

- References: 1) Letter from J. L. Rainsberry (SCE) to the Document Control Desk (NRC), dated February 3, 1997, Subject: 120 Day Response to Generic Letter 96-06: "Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions,"
San Onofre Nuclear Generating Station Units 2 and 3
- 2) Letter from A. E. Scherer (SCE) to the Document Control Desk (NRC), dated October 30, 1998, Subject: Generic Letter 96-06: "Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions," Additional Information
San Onofre Nuclear Generating Station Units 2 and 3

Gentlemen:

This letter provides confirmation that the Southern California Edison Company (SCE) has completed the following actions as committed to in the 120-day response to Generic Letter (GL) 96-06 for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3, reference 1:

- 1) The design change to delay the restart of the Emergency Cooling Units (ECUs) following a safety injection actuation signal, previously reported implemented in Unit 2 by reference 1, has been implemented at Unit 3.

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- 2) The enhancements to the Emergency Operating Instructions for both Units 2 and 3 were implemented prior to returning Unit 2 to service from the Cycle 9 refueling outage to eliminate the susceptibility of the Control Element Drive Mechanism Cooling Units and Reactor Coolant Pump Motor Coolers to either waterhammer or two-phase flow conditions following a Loss of Coolant Accident.
- 3) As reported in reference 1, 87 of the 92 containment penetrations and their piping systems are not subject to an overpressure condition that required physical modifications.

SCE has completed the required physical modifications (changes in insulation) to eliminate the need to take credit for valve leakage for four of the remaining five penetrations and their respective piping systems. These modifications were completed in both Units 2 and 3 prior to their return to service from their respective Cycle 9 refueling outages.

A relief valve was added to eliminate the need to take credit for the elastomeric seal leakage on the remaining penetration and its respective piping system. This modification was completed in Units 2 and 3 prior to their return to service from their respective Cycle 9 refueling outages.

- 4) The procedural changes were completed to ensure that containment penetrations are not isolated from credited relief paths without compensating actions. The procedures for both Units 2 and 3 were revised prior to returning Unit 2 to service from the Cycle 9 refueling Outage. These procedures were implemented at Unit 2 prior to returning Unit 2 to service from the Cycle 9 refueling outage. The Unit 3 procedures that required containment entry or are associated with design changes were implemented prior to the end of the Unit 3 Cycle 9 refueling outage.
- 5) The relief valves that are credited to protect penetrations from overpressure were added to the Inservice Testing (IST) program, and all required testing in accordance with the IST program is current at both Units 2 and 3.

As discussed in reference 2, SCE continues to actively participate in the EPRI project to ensure that as information is learned from the EPRI project it can be evaluated for applicability at San Onofre Units 2 and 3.

April 19, 2000

If you have any questions or would like additional information, please let me or Mr. Jack Rainsberry (949) 368-7420 know.

Sincerely,

A handwritten signature in black ink, appearing to read "J. A. Sloan". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

cc: E. W. Merschoff, Regional Administrator, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2, and 3
L. Raghavan, NRC Project Manager, San Onofre Units 2 and 3