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

June 23, 1989

Docket Nos. 50-361
and 50-362

Mr. Kenneth P. Baskin
Vice President
Southern California Edison Company
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770

Mr. Gary D. Cotton
Senior Vice President
Engineering and Operations
San Diego Gas and Electric Company
101 Ash Street
Post Office Box 1831
San Diego, California 92112

Gentlemen:

SUBJECT: NUCLEAR REACTOR REGULATION RESPONSE TO THE SOUTHERN CALIFORNIA EDISON REQUEST FOR PARTIAL EXEMPTION FROM THE REQUIREMENTS OF 10 CFR 50.62 FOR SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 (TAC NOS. 59139 AND 59140)

On December 29, 1988, you submitted a request for a partial exemption from 10 CFR 50.62, "Requirements for Reduction of Risk From Anticipated Transients Without Scram (ATWS) Events for Light-Water-Cooled Nuclear Power Plants" (ATWS Rule), for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. You requested an exemption from installing an Auxiliary Mitigating System Actuation Circuitry (AMSAC) which is required by the ATWS Rule to be diverse and independent from the existing reactor trip system (RTS). Your request for the exemption has been denied because no new information has been presented to justify reconsideration of the AMSAC requirements of the ATWS Rule by the Nuclear Regulatory Commission (NRC) staff.

In support of your exemption, you presented four options for meeting the AMSAC requirement which you rejected on the basis of cost/benefit considerations. You therefore concluded that SONGS 2 and 3 need only the Diverse Scram System (DSS) and Diverse Turbine Trip (DTT) to meet the intent of the requirements set forth in the ATWS Rule. Similar arguments had been presented by the Combustion Engineering Owners Group (CEOG) in meetings with NRC and in topical reports. The CEOG was advised during those meetings to focus future arguments on changes in risk and competing safety interests with other existing systems that might result from installing AMSAC.

The NRC staff has reviewed your request for partial exemption and determined that the cost/benefit and value/impact ratios that formed the bases of your exemption were considered during the preparation, and before the issuance, of the ATWS Rule. The NRC concluded then that the safety benefits were justified and required the design of AMSAC to be diverse and independent from the existing RTS. In addition, the NRC staff is not persuaded by your arguments to conclude that lower-cost AMSAC alternatives are not feasible. In light of the lack of new information relative to changes in risk, costs/benefits, or competing safety interests that you may have claimed as a result of installing AMSAC, the NRC staff has determined to deny your request for a partial exemption to the ATWS Rule.

DF01
1/1

Your submittal describes the competing risks between the need for a new control system designed to provide emergency feedwater under ATWS conditions and the need to isolate all feedwater to a ruptured steam generator. We expect that the SONGS 2 and 3 AMSAC will be evaluated in accordance with 10 CFR 50.59 to the extent appropriate to assure that it is designed and implemented in a manner that will not degrade the capability of the existing Emergency Feedwater System. We also expect that the Diverse Scram System and Diverse Turbine Trip will be designed and implemented with the same considerations.

By letter dated April 14, 1989 you committed to install the DSS during the Cycle 5 refueling outage for each unit. This commitment satisfies, with regard to the DSS and the DTT, the requirement of 10 CFR 50.62 that the final schedule be mutually agreed upon by the Commission and the licensee. We request that you provide, within 30 days of receipt of this letter, a schedule for implementation of the AMSAC which, subject to our agreement, will bring you into full compliance with the regulation.

Sincerely,

Gary M. Holahan

Gary M. Holahan, Acting Director
Division of Reactor Projects III,
IV, V, and Special Projects
Office of Nuclear Reactor Regulation

cc: See next page

Your submittal describes the competing risks between the need for a new control system designed to provide emergency feedwater under ATWS conditions and the need to isolate all feedwater to a ruptured steam generator. We expect that the SONGS 2 and 3 AMSAC will be evaluated in accordance with 10 CFR 50.59 to the extent appropriate to assure that it is designed and implemented in a manner that will not degrade the capability of the existing Emergency Feedwater System. We also expect that the Diverse Scram System and Diverse Turbine Trip will be designed and implemented with the same considerations.

By letter dated April 14, 1989 you committed to install the DSS during the Cycle 5 refueling outage for each unit. This commitment satisfies, with regard to the DSS and the DTT, the requirement of 10 CFR 50.62 that the final schedule be mutually agreed upon by the Commission and the licensee. We request that you provide, within 30 days of receipt of this letter, a schedule for implementation of the AMSAC which, subject to our agreement, will bring you into full compliance with the regulation.

Sincerely,

Original Signed by:

Gary M. Holahan, Acting Director
Division of Reactor Projects III,
IV, V, and Special Projects
Office of Nuclear Reactor Regulation

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DISTRIBUTION

Docket File	NRC PDR	Local PDR	PD5 Reading
M. Virgilio	J. Calvo	J. Lee	D. Hickman
OGC	E. Jordan	B. GRimes	G. Holahan
S. Newberry	A. Thadani	ACRS (10)	PD5 Plant File
J. Hannon	D. Lynch	G. Knighton	

[SAN ONOFRE PE]

*See previous concurrence

PD5/LA*	PD5/PM*	SICB*	SAD*	PD5/D*	OGC*(see attached)
JLee	DHickman:rw	SNewberry	AThadani	GKnighton	MYoung
2/16/89	2/16/89	2/21/89	3/1/89	3/2/89	5/31/89

#2 6/21 DAK

ADR35	(A)D:DRSP
MVirgilio	GHolahan
6/21/89	6/23/89

Your submittal describes the competing risks between the need for a new control system designed to provide emergency feedwater under ATWS conditions and the need to isolate all feedwater to a ruptured steam generator. We expect that the SONGS 2 and 3 AMSAC will be designed and implemented in a manner that will not degrade the capability of the existing Emergency Feedwater System. We also expect that the Diverse Scram System and Diverse Turbine Trip will be designed and implemented with the same considerations.

By letter dated April 14, 1989 you committed to install the DSS during the Cycle 5 refueling outage for each unit. This commitment satisfies, with regard to the DSS and the DTT, the requirement of 10 CFR 50.62 that the final schedule be mutually agreed upon by the Commission and the licensee. We request that you provide, within 30 days of receipt of this letter, a schedule for implementation of the AMSAC which will bring you into full compliance with the regulation.

Sincerely,

Gary M. Holahan, Acting Director
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We bring to your attention the fact that the deadline for implementing the ATWS Rule was extended from two refueling outages after July 26, 1984 (as stated in the ATWS Rule) to the third refueling outage after the July 1984 date. In your December 29, 1988 letter you stated that, if the NRC approves the existing DSS design in conjunction with your exemption request by April 1, 1990, the new DDS could be installed during the Units 2 and 3 Cycle 6 refueling outage. However, the Cycle 6 refueling outage will be the fifth refueling outage after July 26, 1984 for both units and will most probably not occur until 1991 for Unit 2 and 1992 for Unit 3. You are therefore requested to provide to the NRC, within 30 days of receipt of this letter, a proposed schedule to meet the requirements of paragraphs (c)(1) through (c)(5) of 10 CFR 50.62 for SONGS 2 and 3 that reflects final implementation not later than the Cycle 5 refueling outage for Unit 3 and the Cycle 6 refueling outage for Unit 2.

Your submittal describes the competing risks between the need for a new control system designed to provide emergency feedwater under ATWS conditions and the need to isolate all feedwater to a ruptured steam generator. We expect that the SONGS 2 and 3 AMSAC will be designed and implemented in a manner that will not degrade the capability of the existing emergency feedwater system. We also expect that the diverse scram system and diverse turbine trip will be designed and implemented with the same considerations.

The NRC has concluded that implementation of the ATWS Rule should be independent of the staff's review of proposed equipment design. This conclusion was most recently conveyed to the Babcock and Wilcox Owners Group in my letter to Mr. L. C. Stalter, dated September 7, 1988, subject "August 17, 1988 B&W/NRC ATWS Meeting." The letter stated that the NRC would evaluate a plant-specific "conceptual" design for ATWS modifications and approve or disapprove the design with comments. A more detailed design description would then be provided to the NRC, but the installation process could begin before NRC issued its safety evaluation. Thus, final NRC approval of all equipment required by the ATWS Rule does not have to precede installation.

Sincerely,

Gary M. Holahan, Acting Director
Division of Reactor Projects - III,
IV, V and Special Projects
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Mr. Kenneth P. Baskin
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