

June 18, 2007

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: **Docket Nos. 50-361 and 50-362**
Response to Request for Additional Information on Response to
Generic Letter 2006-03
San Onofre Nuclear Generating Station, Units 2 and 3

- References:
1. May 23, 2007 letter from N. Kalyanam (NRC) to Richard M. Rosenblum (SCE), Subject: San Onofre Nuclear Generating Station, Units 2 and 3, Request for Additional Information on the Response to Generic Letter 2006-03, Potentially Nonconforming Hemyc and MT Fire Barrier Configurations (TAC NOS. MD 1629 and MD 1630)
 2. June 2, 2006 letter from B. Katz (SCE) to Document Control Desk (NRC), Subject: Docket Nos. 50-361 and 50-362, Response to Generic Letter 2006-03, San Onofre Nuclear Generating Station, Units 2 and 3

Dear Sir or Madam:

By letter dated May 23, 2007, the Nuclear Regulatory Commission issued a request for additional information (Reference 1) regarding Southern California Edison's (SCE) response to Generic Letter (GL) 2006-03 (Reference 2). The enclosure provides SCE's response.

There are no regulatory commitments contained in this letter. If you have any questions or require additional information, please contact Ms. Linda T. Conklin at (949) 368-9443.

Sincerely,



Enclosure

A125

MRR

cc: B. S. Mallett, Regional Administrator, NRC Region IV
N. Kalyanam, NRC Project Manager, San Onofre Units 2 and 3
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3

ENCLOSURE

Response to Request for Additional Information (RAI) on Response to Generic Letter (GL) 2006-03

NRC Question 1:

Provide the technical justification that was used to demonstrate that the 3M configurations provide a fire resistance capability greater than the Cerablanket raceways in all installed configurations, including a comparison between the 3M and Cerablanket materials, fire resistance properties, installation configuration, etc.

SCE Response:

The basis for the Southern California Edison (SCE) response on the GL was acceptance criteria used in the fire testing of the 3M and Cerablanket and not a comparison of the two materials' characteristics and configurations. This was discussed with Thinh Dinh of NRC staff during a phone call on May 8, 2007, and he agreed that SCE's comparison of the test criteria was adequate.

The acceptance criteria of the fire testing conducted on Cerablanket was based on maintaining circuit integrity (49 minutes). This was described in a Deviation Request referenced in the GL 2006-03 response. The criteria used for accepting 3M was based on the cold-side temperature requirements of GL 86-10 and that the 3M time to exceeding the cold-side criteria was greater than the original Cerablanket deviation of 49 minutes. Where the time criteria of 60 minutes could not be demonstrated, automatic suppression systems were in place consistent with the NRC-approved deviation. Thus, the basis for demonstrating a greater fire resistance capability was the difference in test acceptance criteria. The cold-side acceptance criteria for 3M is more conservative than the circuit integrity criteria of the Cerablanket testing.

SCE compared fire test reports with installed configurations to ensure that as-found configurations were bounded by fire tests. Some engineering judgement was used on unique raceway configurations to supplement this evaluation (e.g., smaller tested raceway configurations were used to bound larger configurations, etc.). Generally, GL 86-10 was used as a basis for test criteria used to assess 3M.

GL 86-10 Supplement 1 contains "refined and clarified" criteria for assessing raceway fire barrier systems being reviewed by the NRC in the future. SCE did not utilize this criteria for assessing 3M installations.

NRC Question 2:

Confirm that the installed 3M fire barriers that were not bounded by fire testing criteria are installed in accordance with the manufacturer's recommendations, specifically: mat materials used; minimum thickness of material; banding materials and spacing; use of collars; and fill, void, cavity materials used (caulk).

SCE Response:

Field configurations were installed per the guidelines in the 3M manufacturer's manuals used in the 1987-1988 time frame.

NRC Question 3:

Confirm that the plant conditions, namely cable loading, automatic fire detection and suppression, and manual suppression capability are currently the same as they were when the Cerablanket was approved.

SCE Response:

No suppression systems in cable tray areas have been removed since the deviation was submitted. The physical condition of the plant has changed, but not significantly, since the time of installation of Cerablanket (e.g., the addition of minor amounts of combustibles in some areas). The San Onofre design control program evaluates all plant changes for cable ampacity, combustible loading, and impact to post-fire safe shutdown capability.