

August 12, 2008

Mr. Ross T. Ridenoure
Senior Vice President and Chief Nuclear Officer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION UNITS 2 AND 3 –
GENERIC LETTER 2008-01, “MANAGING GAS ACCUMULATION IN
EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND
CONTAINMENT SPRAY SYSTEMS,” PROPOSED ALTERNATIVE COURSE OF
ACTION (TAC NOS. MD7876 and MD7877)

Dear Mr. Ridenoure:

On January 11, 2008, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems” (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759). The GL requested licensees to submit information to demonstrate that the emergency core cooling, decay heat removal, and containment spray systems (hereinafter referred to as the “subject systems”) are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance.

In accordance with Section 50.54(f) of Title 10 of the *Code of Federal Regulations* (10 CFR), GL 2008-01 required that each licensee submit the requested information within 9 months (hereinafter referred to as the “9-month submittal”) of the date of the GL. The GL also stated that if a licensee cannot meet the requested 9-month response date, the licensee is required to provide a response within 3 months (hereinafter referred to as the “3-month submittal”) of the date of the GL, describing the alternative course of action it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

By letter dated May 15, 2008, Southern California Edison (SCE), the licensee, submitted a 3-month response to GL 2008-01 for San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 and 3). The NRC staff assessment of the responses for SONGS 2 and 3 is contained in Enclosure 1.

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The NRC staff reviewed the licensee's proposed alternative course of action and the associated basis for acceptance and concluded that for the SONGS, with the exception of the clarifications and associated requests discussed in Enclosure 1, your proposed alternative course of action related to your 9-month initial response is acceptable. However, the NRC staff requests you submit a 3-month supplemental response to revise your proposed alternative course of action related to your 9-month supplemental (post outage) response for SONGS 2 and 3 as described in Enclosure 1. This letter allows the licensee to implement its proposed alternative course of action for its 9-month initial response, provided that, implementation is consistent with the clarifications and associated requests discussed in Enclosure 1.

If you have any questions regarding this letter, please feel free to contact me at 301-415-1480.

Sincerely,

/RA/

N. Kalyanam, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosure: As stated

cc w/encl: See next page

The NRC staff reviewed the licensee's proposed alternative course of action and the associated basis for acceptance and concluded that for the SONGS, with the exception of the clarifications and associated requests discussed in Enclosure 1, your proposed alternative course of action related to your 9-month initial response is acceptable. However, the NRC staff requests you submit a 3-month supplemental response to revise your proposed alternative course of action related to your 9-month supplemental (post outage) response for SONGS 2 and 3 as described in Enclosure 1. This letter allows the licensee to implement its proposed alternative course of action for its 9-month initial response, provided that, implementation is consistent with the clarifications and associated requests discussed in Enclosure 1.

If you have any questions regarding this letter, please feel free to contact me at 301-415-1480.

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Docket Nos. 50-361 and 50-362

Enclosure: As stated

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U.S. NUCLEAR REGULATORY COMMISSION
STAFF ASSESSMENT OF 3-MONTH RESPONSE
TO GENERIC LETTER 2008-01
SOUTHERN CALIFORNIA EDISON COMPANY
SAN ONOFRE NUCLEAR GENERATING STATION UNITS 2 AND 3
DOCKET NOS. 50-361 and 50-362

1.0 Background

On January 11, 2008, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759). The GL requested licensees to submit information to demonstrate that the emergency core cooling, decay heat removal, and containment spray systems (hereinafter referred to as the "subject systems") are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance. Specifically, the GL requested licensees to provide: (1) a description of the results of evaluations that were performed in response to the GL; (2) a description of all corrective actions that the licensee determined were necessary; and (3) a statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

In accordance with Section 50.54(f) of Title 10 of the *Code of Federal Regulations* (10 CFR), GL 2008-01 required that each licensee submit the requested information within 9 months (hereinafter referred to as the "9-month submittal") of the date of the GL. The GL also stated that if a licensee cannot meet the requested 9-month response date, the licensee is required to provide a response within 3 months (hereinafter referred to as the "3-month submittal") of the date of the GL, describing the alternative course of action it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

2.0 Licensee's Proposed Alternative Course of Action

By letter dated May 15, 2008, Southern California Edison (SCE, the licensee), submitted a 3-month response to GL 2008-01 for San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 and 3). The licensee indicated that it could not complete, within the requested 9-month period, the necessary walkdowns because of one or more of the following reasons: (1) the restrictions on removal of insulation from piping on operating systems due to equipment qualification concerns; (2) ALARA considerations for entry into radiation areas; and (3) the requirements to erect scaffolding which may affect equipment operability.

As an alternative course of action, SCE stated that it would submit a response within nine months of the date of the GL providing the results of the evaluation, identifying requiring confirmatory walkdowns that have not been completed, and provide the schedule for their completion. SCE concluded that the alternative course of action is acceptable, based on the adequacy of the current design, additional vent locations added as needed, plant surveillance and analysis, and the results of previous system inspections.

3.0 NRC Staff Assessment

The NRC staff finds that for SONGS 2 and 3, with the exception of the clarifications and associated requests discussed below, the licensee's proposed alternative course of action related to its 9-month initial response is acceptable. This is based on current designs, plant surveillance and analysis, and inspection results associated with managing gas accumulation at SONGS. However, the NRC staff requests that the licensee submit a 3-month supplemental response for SONGS 2 and 3 to revise its proposed alternative course of action related to its 9-month supplemental response as described below.

The NRC staff notes the following examples where the licensee's 3-month submittal dated May 15, 2008, does not clearly describe the content and/or schedule for the 9-month submittals:

- (1) Although the licensee plans to include the results of its evaluation in its 9-month response, it does not state that its evaluation will include the reviews of the licensing basis, the design drawings, and the testing and system operating procedures, and the corrective actions resulting from the walkdowns that are completed before October 11, 2008, in its 9-month response.
- (2) While the licensee indicated that in the 9-month response, it would identify the required confirmatory walkdowns that have not been completed, and provide the schedule for their completion, it did not state when the remaining walkdowns that were not completed by October 11, 2008, would be completed and results will be submitted to the NRC. Since the design details and as-built configurations may be different in each of the two units, the NRC staff requests the licensee to provide a separate 9-month supplemental response for each of the two units.

The NRC staff requests that the licensee submit the information requested in the GL as follows:

- (1) 9-Month Initial Submittal - For the portions of the subject systems that are accessible prior to the next refueling outages for SONGS 2 and 3, provide all the information requested by the GL to the NRC by October 11, 2008. The NRC staff finds that licensee's plan regarding the 9-month initial response is acceptable.
- (2) 9-Month Supplemental (Post-Outage) Submittals - Except for the long-term items described below, provide all the remaining information requested by the GL for the subject systems to the NRC within 90 days following completion of the first refueling outages that initiate from October 11, 2008, for each of SONGS 2 and 3. The NRC staff requests the licensee to submit a 3-month supplemental response to provide a revised commitment that meets the request of the 9-month supplemental responses for each of SONGS 2 and 3.

For each of the two submittals, (the 9-month initial and supplemental submittals), and consistent with the information requested in the GL, the licensees should provide: (1) a description of the results of evaluations that were performed in response to the GL; (2) a description of all corrective actions that the licensee determined were necessary; and (3) a statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

The NRC staff noted that the licensee's submittal dated May 15, 2008, did not mention other potential long-term actions that are identified in the GL. For instance, the industry is assessing whether it is necessary to perform pump testing to determine the allowable limits on ingested gas volume in pump suction, as well as the need to develop an analysis capability to adequately predict void movement (entrapped gas) from piping on the suction side of the pumps into the pumps. It is unlikely this industry effort will be complete for the 9-month initial or supplemental submittals. Further, technical specification changes may be necessary to reflect the improved understanding achieved during response to the GL, but these cannot be fully developed for the 9-month initial or supplemental submittals. A Technical Specifications Task Force traveler may provide a generic example that can be adopted by licensees. The NRC staff requests that the licensee address in its 9-month submittal how it plans to track such long-term actions (e.g., Corrective Action Program and/or commitment tracking). The NRC plans to perform follow up inspections of licensee responses to GL 2008-01 at all plants using a Temporary Instruction inspection procedure.

San Onofre Nuclear Generating Station
Units 2 and 3

(June 2008)

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