



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-4005

June 16, 2006

(b)(7)(C)

7.C

SUBJECT: ALLEGATION NO. RIV-2006-A-0054

7.C

Dear (b)(7)(C)

This letter refers to your letter dated June 5, 2006, in which you expressed concerns related to San Onofre. You were concerned about electrical protection and cable ampacity calculations.

Outside of Scope

Enclosure 1 to this letter documents our understanding of your concerns. We will initiate actions to examine the facts and circumstances based on our understanding of your concerns. Therefore, if the summary of your concerns is not accurate, please contact me so that we can correct any misunderstanding before we complete our review.

An evaluation of your technical concerns should normally be completed within 6 months, although complex issues may take longer. You will be informed of the results of our review. In resolving your concerns, NRC intends to take all reasonable efforts not to disclose your identity (as discussed in the enclosed brochure). However, you are not considered a confidential source unless an explicit request of confidentiality has been formally granted in writing.

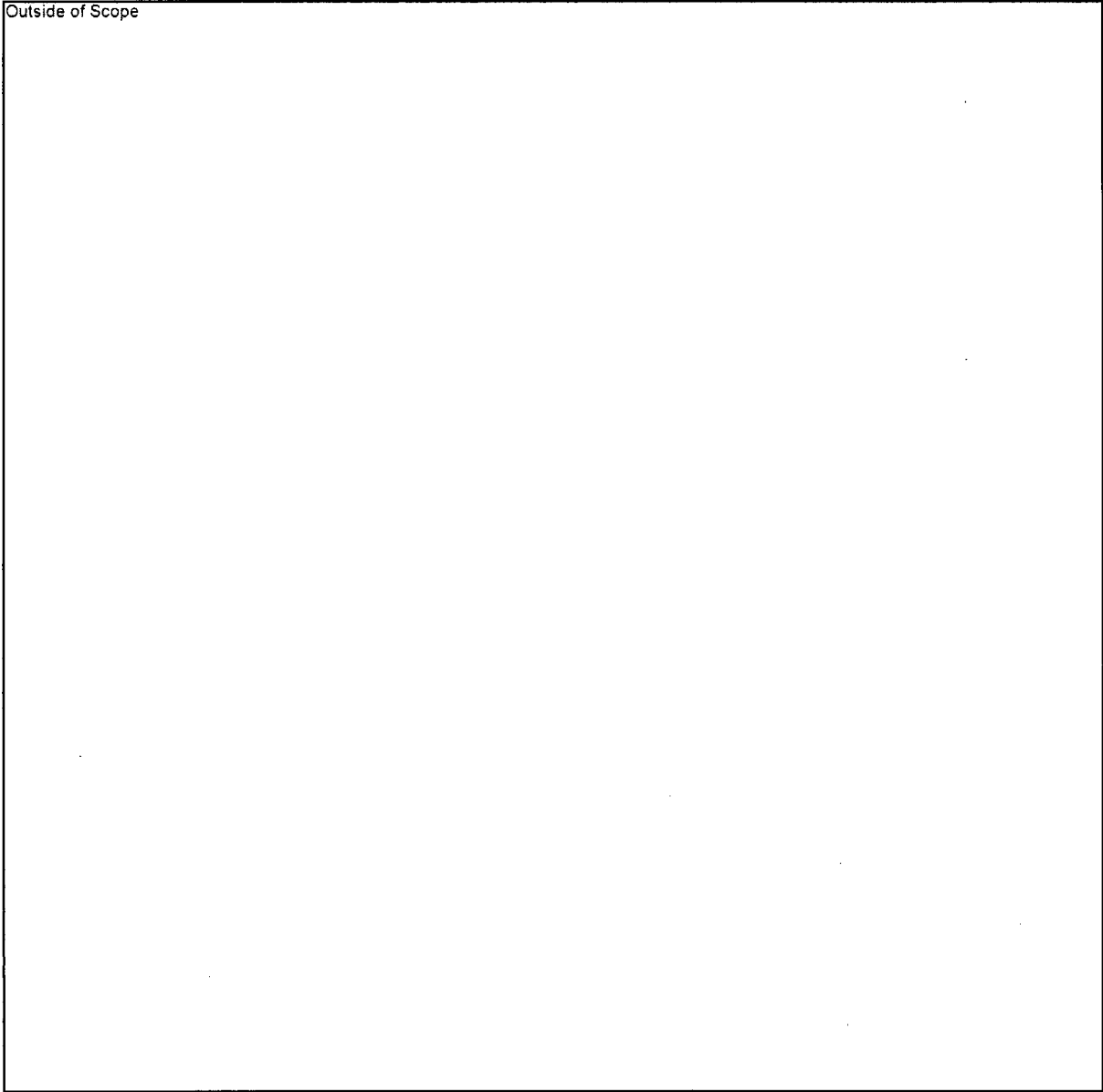
Outside of Scope

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions  
FOIA- 2011-0151

E/S

Outside of Scope



The enclosed NRC brochure, "Reporting Safety Concerns to the NRC," contains information that you may find helpful in understanding our process for review of safety concerns. It includes an important discussion (on Pages 5-7) of our identity protection procedures and limitations. **Please read that section.** Please also note that in light of the changes to the NRC inspection program for reactors, the licensee may conclude that any NRC followup of your concerns is related to an allegation. Additionally, if you have raised this issue internally, there is the possibility that the licensee may conclude that you raised the issue to our attention.

The NRC will take all reasonable efforts not to disclose your identity during any followup of your technical concerns. Please be aware that if you fall under any of the six circumstances described on Page 6 of the Identity Protection Limitations section of the enclosed NRC brochure, we may not be able to protect your identity. The brochure also includes a discussion of your right to file a complaint with the U.S. Department of Labor if you believe you have been subjected to employment discrimination for raising safety concerns and you desire a personal remedy.

Thank you for notifying us of your concerns. We will advise you when we have completed our review of this matter. Should you have any questions or comments during the interim regarding this matter, please call me Monday - Friday between 8:00 a.m. and 4:30 p.m. central time at 800-952-9677 extension 245 or on the NRC Safety Hotline at 800-695-7403. Should you want to respond in writing, our mailing address is listed in the header of this letter.

Sincerely,

A handwritten signature in cursive script that reads "Harry A. Freeman". The signature is written in black ink and has a fluid, connected style.

Harry A. Freeman  
Senior Allegation Coordinator

Enclosures:

1. Statement of Concerns
2. Reporting Safety Concerns to the NRC
3. NRC's Early ADR Program

**STATEMENT OF CONCERNS**

**RIV-2006-A-0054**

Allegedly:

**Concern 1**

You are concerned that several safety related breakers (480V load centers B04 & B06, described in calculation E4C-099) will not clear on overload and/or abnormal conditions and may damage the cables. Overload conditions are not alarmed. Cable damage may go unnoticed and as a result the safety related loads may not perform its function during an accident condition.

The acceptance criteria, exceptions to the criteria, and analysis stated in the base calculation are ambiguous. The exception to criteria for Short Time Pickup may trip a motor prematurely during starting.

**Concern 2**

You are concerned that the derated ampacity of some of the 480 cables (listed in calculations E4C-065 & E4C-120) is less than the continuous load current. The main drawbacks of these calculations are false assumptions and methodology. The number of outstanding changes is in hundreds. This is a worst error likely situation and as a result some of the class 1E devices may not perform the intended safety function.

**Concern 3**

You are concerned that the first line supervisors are rubber stamping the electrical calculations. As a result, there is lack of uniformity and consistency in electrical calculations.

Outside of Scope

**ENCLOSURE 1**