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 FACIL: 50-361 San Onofre Nuclear Station, Unit 2, Southern California      05000361  
 50-362 San Onofre Nuclear Station, Unit 3, Southern California      05000362

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SUBJECT: Requests extension of submittal date for response to Generic Ltr 88-20 re individual plant exam for severe accident vulnerabilities from 920901 to 930501.

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*Southern California Edison Company*

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May 22, 1992

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
Generic Letter 88-20, "Individual Plant Examination (IPE)  
for Severe Accident Vulnerabilities - 10 CFR 50.54(f)"  
San Onofre Nuclear Generating Station  
Units 2 and 3

Reference: November 3, 1989, letter from R. M. Rosenblum  
(SCE) to Document Control Desk (NRC), Subject:  
Docket Nos. 50-206, 50-361, and 50-362, Generic  
Letter 88-20, "Individual Plant Examination (IPE)  
for Severe Accident Vulnerabilities, San Onofre  
Nuclear Generating Station, Units 1, 2, and 3"

In the above reference Southern California Edison (SCE) committed to submit no later than September 1, 1992 the results of the Individual Plant Examination (IPE) for San Onofre Units 1, 2, and 3. This date is consistent with the requested schedule in Generic Letter (GL) 88-20.

This letter extends the date for submitting the IPE for Units 2 and 3 until May 1, 1993. While we would prefer to complete the IPE within the requested three-year time, we believe that this extension allows us to more fully meet the intent of the IPE guidance.

In May 1990, SCE contracted with an experienced Probabilistic Risk Assessment (PRA) consultant to manage the Level 1 portion of the IPEs for San Onofre Units 1, 2, and 3. Unfortunately, this contractor underestimated the complexity of the IPEs which resulted in severe schedule slippages. When this was realized, SCE personnel began to assume contractor responsibilities on the Unit 1 IPE because of the Unit 1 non-standard design and accelerated schedule. As a result of the focus on Unit 1 and a large number of unanticipated design studies, SCE was not able to assume the contractor responsibilities for the Units 2 and 3 IPE in time to absorb the delay in the schedule.

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In evaluating our ability to maintain the IPE schedule we considered various alternatives; including alternative contractors, use of significant overtime, and scaling back our objectives. Our conclusion is that these alternatives are not feasible. However, in addition to refocusing the efforts of inhouse personnel to the Units 2 and 3 IPE we have also increased the PRA staffing. Therefore, we have a high confidence that the May 1, 1993 date will be met.

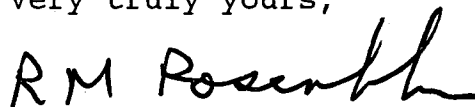
SCE is committed to achieving excellence in meeting the objectives of the IPE. The San Onofre IPE will be responsive to all requirements outlined in GL 88-20 and NUREG-1335, "Individual Plant Examination: Submittal Guidance," and will substantially exceed them in the areas of documentation, maintainability, and utility staff involvement.

Currently, the Level 1 portion of the IPE for Units 2 and 3 is approximately 60% complete, and the Level 2 portion is approximately 30% complete.

There is no safety impact due to the delay in submitting the IPE report as we believe, based on the results of partially completed PRAs for Units 2 and 3, that the IPE will not identify vulnerabilities warranting substantive plant modifications.

If you have any questions regarding this matter, please let me know.

Very truly yours,



cc: J. B. Martin, Regional Administrator, NRC Region V  
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3  
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre  
Units 1, 2, and 3