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SUBJECT: Provides first edition of integrated implementation schedule for Units 2 & 3,per890515 ltr. R I D S / A D D S

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November 15, 1989

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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  
First Edition of the Integrated Implementation  
Schedule (IIS) (TAC Nos. 62844/5)  
San Onofre Nuclear Generating Station  
Units 2 and 3

Reference: May 15, 1989 letter from D. E. Hickman (NRC), to Kenneth P. Baskin (SCE); Subject: Issuance of Amendment No. 72 to Facility Operating License No. NPF-10 and Amendment No. 60 to Facility Operating License No. NPF-15

This letter provides, as enclosures 1, 2 and 3, the first edition of the Integrated Implementation Schedule (IIS) for San Onofre Units 2 and 3. These enclosures respond to the requirements of License Conditions 2.C(26) for Unit 2 and 2.C(27) for Unit 3 which were recently issued by the above reference and require implementation of a plan for scheduling capital modifications.

The IIS methodology, which has been approved by the NRC, utilizes the Westinghouse Analytical Ranking Process (WARP) to determine the relative potential safety significance of each regulatory committed modification. The methodology requires that after the projects are ranked, they be evaluated using normal scheduling methods to determine implementation schedules. The highest ranked projects are evaluated first and scheduled for the earliest outage in which implementation constraints of a normal refueling outage would not be exceeded. The schedules of each unit are then separated into the following three lists as described in the License Condition:

Schedule A

All items which have implementation dates required by NRC regulations, orders or license conditions.

Schedule B

Regulatory items (of either generic or plant specific nature) identified by the NRC which have implementation dates committed to by SCE and which would result in either, (a) plant modifications,

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(b) procedure revision, or (c) changes in facility staffing requirements; or items perceived by SCE as prospective NRC requirements; or major tasks resulting from mandates of agencies other than the NRC. Also included are evaluations for major initiated issues not required by regulation, license conditions or orders.

Schedule C

SCE initiated plant betterment projects.

SCE has completed the evaluation of all currently committed regulatory modifications for SONGS 2 and 3. Enclosure 1 lists, by outage, the SONGS 2 Schedule A, B and C projects. Enclosure 2 contains a similar listing for Unit 3. This is the first edition of the IIS for SONGS 2 and 3. Due to the time frame associated with this first IIS submittal, the modification schedules for Units 2 and 3 will not be significantly impacted by the IIS Rankings. All regulatory related modifications, which SCE has committed to implement, will be completed during the next Refueling Outage for Unit 2 (Cycle 6) and in the next two Refueling Outages for Unit 3 (Cycles 5 and 6).

As required by the License Conditions, Enclosure 3 contains a listing of ongoing evaluations for major issues which have been initiated for SONGS 2 and 3.

Approximately 35% of resources for the Unit 2 Cycle 6 Refueling Outage will be allocated to regulatory projects and approximately 20% of resources for the Unit 3 Cycle 5 Refueling Outage will be allocated to regulatory projects. The above-resource allocation percentages include two major plant betterment projects (Spent Fuel Pool Reracking for Units 2 and 3 and Third Point Feedwater Heater Replacement for Unit 3). If these projects are excluded, resources allocated for regulatory projects would be approximately 65% and 55% for Units 2 and 3, respectively.

If you have any questions on the first edition of the SONGS 2 and 3 IIS, or if you require additional information, please let me know.

Very truly yours,



FEIIS3

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

SONGS 2 IIS

Cycle 6

Schedule A\*

Anticipated Transient Without Scram (ATWS) Diverse  
Emergency Feedwater Actuation System (10CFR50.62)  
Station Blackout Modifications (10CFR50.63)  
(Contingent on NRC issuance of SER)

Schedule B\*\*

Charging Room Component Venting to Heating  
Ventilation and Air Conditioning (HVAC) (NRC  
Inspection Report 50-361/86-25, 50-362/86-26)+  
Atmospheric Dump Valves (ADV) Upgrades to Allow  
Easier Valve Operation (Letter to NRC, September 12,  
1988)  
Component Cooling Water (CCW) Make-Up Water Modifi-  
cations Per Results of SSFI (Final Modifications to  
be Selected at Conclusion of Study)  
Second Refueling Water Level Indicator (GL 88-17)  
HVAC Vital Barrier Stops (IE Notice 86-83)

Schedule C\*\*\*

Reliability Improvements to Blowdown Processing System  
(BPS) Discharge Filter System  
Spent Fuel Pool Purification System Cross Tie+  
Control Room Indication of ADV Position  
Snubber Reduction (Ongoing Program)  
Centrifugal Charging Pump Addition  
Steam Generator High Level Trip Bypass During Startup  
New Ladders and Platforms (Ongoing Program)  
Sewage Plant Upgrade+  
Spent Fuel Pool Reracking+

\*NRC Rule or Order

\*\*Regulatory Commitment (other than Schedule A)

\*\*\*Plant Betterment

+This is a Non-Outage Related Modification

SONGS 3 IIS

Cycle 5

Schedule A\*

ATWS Diverse Reactor Trip (10CFR50.62)

Schedule B\*\*

Chemical Volume Control System (CVCS) Panel  
Modifications (NUREG-0700)  
Control Room Labeling/Instrument Panel Modifications  
(NUREG-0700)  
Modify Instrument Air and Nitrogen Systems to Comply  
with GL 88-14  
Pressurizer Spray Line Modifications (NRC Bulletin  
88-08)

Schedule C\*\*\*

Non-IE Uninterruptible Power Supply (UPS) Inverter  
Alarm Deletion  
Chemistry Panel Improvements  
Feedwater 3rd Point Heater Replacement  
Letdown Accumulator Modification to Reduce Flow and  
Pressure Instabilities  
Replace Feedwater Isolation Valve Marottas with Paul  
Monroe Solenoids to Increase Reliability  
Ladders and Platforms for Personnel Safety (Ongoing  
Program)  
Spent Fuel Pool Reracking+

\*NRC Rule or Order

\*\*Regulatory Commitment (other than Schedule A)

\*\*\*Plant Betterment

+This is a Non-Outage Related Modification

SONGS 3 IIS (Cont'd)

Cycle 6

Schedule A\*

ATWS Diverse Emergency Feedwater Actuation System  
(10CFR50.62)  
Station Blackout (10CFR50.63) (Contingent on NRC  
issuance of SER)

Schedule B\*\*

Charging Room Component Venting to HVAC  
(NRC Inspection Report 50-361/86-25, 50-  
362/86-26)+  
ADV Upgrades to Allow Easier Valve Operation (Letter to NRC,  
September 12, 1988)  
CCW Make-Up Water Modifications (Results of SSFI)  
(Final Modifications to be Selected at Conclusion  
of Study)  
Second Refueling Water Level Indicator (GL 88-17)  
HVAC Vital Barrier Stops (IE Notice 86-83)

Schedule C\*\*\*

Reliability Improvements to BPS Discharge Filter  
System  
Control Room Indication of ADV Position  
Snubber Reduction (Ongoing Program)  
Centrifugal Charging Pump Addition  
Steam Generator High Level Trip Bypass During Startup  
New Ladders and Platforms (Ongoing Program)

- \*NRC Rule or Order
- \*\*Regulatory Commitment (other than Schedule A)
- \*\*\*Plant Betterment
- +This is a Non-Outage Related Modification

ENCLOSURE 3

Ongoing Evaluations for Major Issues (SONGS 2 and 3)

GL 89-10 Safety-Related Motor-Operated Valve Testing  
and Surveillance

GL 89-13 Service Water Systems Problems Affecting Safety-  
Related Equipment

Annunciator Evaluations per Results of Detailed Control Room  
Design Review (NUREG-0700)