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TEDESCO,R.L. Assistant Director for Licensing

SUBJECT: Responds to 811010 ltr re IE Bulletin 79-15, "Deep Draft Pump Deficiencies." Deep draft pump maint,insp & test procedures are available at site for review.

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October 21, 1981

Robert L. Tedesco, Assistant Director for Licensing
Division of Licensing
U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

The purpose of this letter is to respond to your letter dated August 10, 1981, regarding I&E Bulletin 79-15 "Deep Draft Pump Deficiencies". As noted in our original response to this Bulletin, 4 Byron Jackson model 33W X VCT, single stage pumps, having 17,000 GPM capacity at 80 ft. head, are utilized to provide Salt Water Cooling to each of SONGS Units 2&3.

The guidelines furnished with your letter address 1) pump installation and 2) pump testing as the major considerations in a long term operability assurance program. A review of Southern California Edison efforts in this regard has been completed and the following information is provided:

1) Installation - Original installation of Salt Water Cooling pumps at SONGS 2&3 was performed by Bechtel Power Corporation in accordance with Byron Jackson instructions contained in the pump's technical manual and was completed prior to receipt of the guidelines contained in your letter. Southern California Edison Company has established station maintenance procedure S023-I-5.4 to be utilized each time deep draft salt water cooling pumps are disassembeld and reinstalled. This procedure was prepared based on the recommendations provided in the pump manufacturers technical manual for this pump, original pump specifications and the knowledge and experience obtained from operation and maintenance of such pumps on SONGS Unit 1. Clearances between bearings and shafts are measured and recorded as are wear ring clearances and shaft alignment, as required by this procedure.

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2) Testing Requirements - In addition to a comprehensive preventive maintenance program, the SCE long term operability assurance program includes (a) inservice inspection and testing at 3 month intervals per ASME Section XI requirements using station procedures S023-V-3.4.0 and S023-V-3.4.8 and (b) monthly operability verifications per technical specification surveillance requirements using station procedure S023-3-3.18. The extensive instrumentation, testing, disassembly, inspection and reassembly required to conform with the guidelines provided with your letter, are more appropriate for pump manufacturer or testing laboratory performance in a controlled environment and do little to assure pump operability after installation in the field. Close verification and inspection during installation and frequent periodic inspections and tests as outlined above will provide more assurance of pump operability for field installations than the 3 phases of testing suggested in the guidelines.

Deep draft pump maintenance, inspection and test procedures are available at the SONGS 2 and 3 station for review.

It must be noted here that only one of the four available deep draft pumps provided for each unit would provide adequate cooling water to either of the redundant cooling water trains under normal or emergency operating conditions (Ref. FSAR Table 9.2-2). Though technical specifications require that at least two pumps be operable during normal operation, two additional pumps, beyond those required by the technical specifications, are intended as backup pumps to provide further assurance of cooling water availability.

It is SCE's position that this degree of pump redundancy, along with preventive maintenance, inservice inspection, and testing programs planned for salt water cooling pumps will provide more than adequate assurance of the availability of cooling water for the length of time required to achieve cold shutdown under any circumstance.

If there are any questions or you require further information, please contact me.

Very truly yours,

JCP Bastin / WCarmody