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Southern California Edison Company

23 PARKER STREET IRVINE, CALIFORNIA 92718

December 23, 1991

R. M. ROSENBLUM MANAGER OF NUCLEAR REGULATORY AFFAIRS

> U. S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, D. C. 20555

Gentlemen:

Subject: Docket Numbers 50-206, 50-361, and 50-362 Schedules for Completing the Individual Plant Examination of External Events (IPEEE), Generic Letter 88-20, Supplement 4 San Onofre Nuclear Generating Station Units 1, 2, and 3

This letter provides Southern California Edison's (SCE) schedule for submitting the analysis requested in Supplement 4 of Generic Letter 88-20, "Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities." SCE requests NRC approval to submit the analysis later than requested in the generic letter supplement.

Generic Letter 88-20, Supplement 4, requested the submittal of the IPEEE results to the NRC by June 28, 1994, i.e., three years after issuance of the generic letter. SCE will not be able to provide the IPEEE results by the requested date. Currently, the personnel responsible for performing the IPEEE must first complete the Individual Plant Examination (IPE) of Internal Events for San Onofre Units 1, 2, and 3. SCE is performing the IPE mainly with inhouse staff and intends to conduct the IPEEE in the same manner. This is in keeping with the original recommendations of GL 88-20. Thus, the IPEEE effort cannot begin for San Onofre until the IPE is completed for all units.

In addition, while other plants may perform a Seismic Margin Study to satisfy the seismic requirements of the IPEEE, SCE will be performing a Full-Scope Seismic Probabilistic Risk Assessment (PRA) for each unit to satisfy the IPEEE requirements. A full-scope seismic PRA requires substantially more resources and time than a Seismic Margin Study. Therefore, SCE requests NRC approval to extend the IPEEE submittal date to June 28, 1996, for San Onofre Units 2 and 3. and to June 28, 1997, for San Onofre Unit 1.

SCE's IPEEE analysis will follow the guidance provided in NUREG-1407, "Procedural and Submittal Guidance for the Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities." The specific methods chosen to perform the IPEEE for San Onofre will satisfy the NRC's guidance.

TELEPHONE

(714) 454-4505

9112300117 911223 PDR ADOCK 05000206 PDR PDR Document Control Desk

SCE agrees with the NRC staff that the systematic examination may help identify potential plant-specific vulnerabilities to severe accidents. If any are identified, SCE will determine improvements, undertake corrective actions, and report them together with the IPEEE results.

If you have any questions, please let me know.

Very truly yours,

Rabs

R. M. Rosenblum Manager of Nuclear Regulatory Affairs

State of California County of Orange

On 12/23/91 before me, <u>Mariane Sanchez</u>, personally appeared <u>R. M. Rosenblum</u>, personally known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument, the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature



cc: J. B. Martin, Regional Administrator, NRC Region V
George Kalman, Senior NRC Project Manager, San Onofre Units 1, 2 & 3
J. O. Bradfute, NRC Project Manager, San Onofre Unit 1
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2 & 3