Southern California Edison Company

23 PARKER STREET

IRVINE, CALIFORNIA 92718

April 29, 1993

WALTER C. MARSH
ASSISTANT MANAGER,
NUCLEAR REGULATORY AFFAIRS

TELEPHONE
(714) 454-4403

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

Gentlemen:

Subject: **Docket No. 50-206**
Open Commitments Disposition
San Onofre Nuclear Generating Station
Unit 1

References: (1) Letter dated February 21, 1992, from Thomas E. Murley (NRC) to Harold B. Ray (SCE), Closure of San Onofre Nuclear Generating Station Unit 1

(2) Letter dated July 8, 1992, from R. M. Rosenblum (SCE) to the NRC, TAC List Status

By Reference 1, the NRC requested us to review existing commitments and ongoing licensing actions for SONGS 1 and propose an appropriate disposition of these issues in view of the shortened operational life of the plant. By Reference 2, we complied with this request by responding to items indicated on the NRC TAC List. Our letter also included a proposed disposition of Cycle 12 FTOL items that did not have a TAC item number.

As a followup to the above effort, we reviewed other commitments relating to Unit 1 which have arisen from documents such as LER's, inspection reports, exit interviews, etc. as they are documented in our regulatory commitments tracking system (RCTS) for SONGS 1. Enclosures 1 and 2 describe the results of this effort. Also included is the disposition of two Cycle 12 modifications regarding the emergency diesel generators. Enclosure 1 consists of commitments which we do not plan to complete, and justification for the deletion of the commitment. Enclosure 2 consists of commitments which we have completed or will be completing.

A001
1/1

This letter is for your information only. If you have any questions, please call me.

Very truly yours,

Walter C. Marsh

Attachments
cc: J. B. Martin, Regional Administrator, NRC Region V
S. W. Brown, NRC Project Manager, San Onofre Unit 1
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2&3
R. F. Dudley, Jr., Section Chief, Non-Power, Decommissioning, and Environmental Project, Directorate of Reactor Projects - 3, 4 and 5

COMMITMENTS THAT WILL NOT BE COMPLETED

The following commitments will not be completed for SONGS 1 for the reasons indicated.

9210012 Revise Operations Procedure SO1-7-2

SOURCE: The NRC Resident Exit Interview held on August 26, 1992 covered six weeks of routine inspection. During that period the resident discovered an air horn wedged between a snubber and a Safety Injection System (SIS) pipe. We committed to revise plant documents (including Procedure SO1-7-2) to provide better guidance in the area of non-qualified components attached to a safety-related system.

REASON: Procedure SO1-7-2 applies specifically to the SIS. Since the SIS has been permanently taken out of service, a revision to this procedure is no longer needed. (To address the NRC's generic concern, administrative controls or procedure changes regarding non-qualified attachments to safety-related systems when these systems are required to be operable will be instituted.)

9110022 Amphenol Penetrations

SOURCE: In a telephone discussion on June 10, 1991 the NRC requested us to follow the situation at the Trojan containment with regard to amphenol penetrations and notify the NRC of the resolutions that may apply to SONGS 1. Trojan discovered that the containment penetration seals had degraded such that the penetrations were unable to pass the Local Leak Rate Test (LLRT).

REASON: With SONGS 1 shut down and defueled, LLRTs are not required since no Design Basis Accident (DBA) is possible inside the containment. Based on this, potentially degraded amphenol penetrations are no longer a concern at SONGS 1.

9004175 Charging Pump Hydrogen Injection

SOURCE: LER 1-90-006 reported on the finding that the control valves which provide blended boric acid to the charging pumps (CV-406A & B) are "fail open valves" but should be "fail closed valves." This could cause gas binding of the charging pumps by the injection of hydrogen from the Volume Control Tank (VCT). The corrective actions from the LER to perform modifications to CV-406A & B resulted in this commitment.

REASON: The modifications to valves CV-406A & B were scheduled for the Cycle 12 refueling outage. With SONGS 1 permanently defueled, the charging pumps are not required. The chemical and volume control system (CVCS) will be out of service in its entirety.

9006022 IST Program Update From Programmatic Reviews

SOURCE: LER 1-90-009 reported that six check valves in the secondary chemical feed system of SONGS 1 were not tested in accordance with the inservice testing (IST) program. One corrective action was for us to update the IST Program to reflect the SONGS 1 single failure analyses (SFA) review and the SONGS 1 design basis documentation (DBD) review.

REASON: The conclusions from the SONGS 1 SFA have already been taken into consideration in the IST program. Due to the permanent shutdown of SONGS 1, the DBD program need not and will not be completed for SONGS 1.

9109013 Air Flow Test Methodology/Acceptance Criteria
9109014 Effect of Removal of the Sodium Silicate Coating

SOURCE: LER 1-90-021 reported on the blockage of several nozzles with sodium silicate, discovered during the Containment Spray System (CSS) air flow test on July 4, 1990. We made several commitments which are listed below.

- Commitment 9109013 was to review our flow test methodology and acceptance criteria to determine air flow test procedure enhancement necessary to ensure valid test results were achieved. We committed to evaluate the effect of the removal of the sodium silicate coating from the CSS piping with regard to the long term susceptibility of the CSS to corrosion and its effect on system operability.

- Commitment 9109014 was to implement a program for periodic evaluations of CSS piping thickness.

REASON: The CSS is no longer needed, since SONGS 1 has been permanently shut down. The commitments described above are not required to maintain SONGS 1 in a safe permanently-defueled condition.

9112010 LER 1-91-017 Incorporation of Event into Continuing Training
9112011 LER 1-91-017 AP4B and AP4D Relay Replacement
9112012 LER 1-91-017 RCM Evaluation of Relay

SOURCE: LER 1-91-017 was written after SONGS 1 automatically tripped from 91% power on a spurious high Startup Rate (SUR) signal due to a momentary ground fault on the bus. SCE committed to several corrective actions.

- Commitment 9112010 was to incorporate this event into applicable technician continuing training programs.
- Commitment 9112011 was to replace the AP4B relay during the next outage of sufficient duration with availability of a replacement relay.
- Commitment 9112012 was to perform a reliability centered maintenance evaluation to determine the appropriate preventive maintenance to be implemented on the AP4B and AP4D relays.

REASON: With SONGS 1 permanently shut down, there is no possibility of trips, thus eliminating trip hazards. Incorporating this event into technician training is not required to maintain SONGS 1 in a safe permanently-defueled condition. (This commitment has been completed for SONGS 2/3).

Replacing the high startup rate block relay AP4B will not be required to maintain SONGS 1 in a safe permanently-defueled condition.

Preventive maintenance on the relays is no longer required to maintain SONGS 1 in a safe permanently-defueled condition.

9204021 LER 3-92-002 Strengthen Administrative Controls For ACR Booster Amp

SOURCE: LER 3-92-002 reported that the SONGS 3 source range neutron flux monitor was not providing audible indication in containment at the commencement of core reload. This was a result of the Audible Count Rate (ACR) booster amplifier having been placed in the off position. As a result of this incident one of the corrective actions was to strengthen the administrative controls governing the installation and use of the ACR booster amplifier. This corrective action will not be completed for SONGS 1.

REASON: The source range monitors are not required to maintain SONGS 1 in a safe permanently-defueled condition.

9005092 Additional Independent and Interdisciplinary Review

SOURCE: LER 1-88-009 reported that an emergency diesel generator (DG) had been loaded greater than permitted by Technical Specifications. The root cause pointed to the independent review of the calculation that established the loads on the DGs. One of the LER corrective actions was to review all the independent reviewers calculations. Two of the calculations were going to be redone and the other five re-reviewed.

REASON: Three of the calculations (including the two we committed to redo) were redone, three were re-reviewed, and one has not been re-reviewed. SONGS 1 has been permanently shut down. The re-review of the calculation is no longer necessary, since the DGs will not be required as safety-related equipment after the Permanently Defueled Technical Specifications (PDTS) become effective.

9207053 Evaluate Need for Synchrocheck Relay Modification

SOURCE: In a letter from R. M. Rosenblum (SCE) to the NRC on July 8, 1992, we committed to re-evaluate the need for a synchrocheck relay modification to the emergency diesel generators electrical scheme and inform the NRC of our intentions.

This was a FTOL Cycle 12 commitment to ensure that out of phase synchronization is minimized during the periodic paralleling of the diesels with the main grid.

By our letter dated June 12, 1992, forwarding the Thirteenth Edition of the Integrated Implementation Schedule for SONGS 1, we had cancelled this modification as a result of the impending shutdown of Unit 1. In our letter of July 8, 1992 (referred to above), we opted to re-evaluate the need for this modification, taking into account the diesel testing requirements applicable to the permanently-defueled mode.

REASON: This modification represents an early corrective solution proposed by the NRC to safeguard the diesel crankshafts against cracks, similar to those that were observed in 1984. The modification was intended to minimize overstressing of the crankshafts due to large torques that could result from inadvertent out of phase synchronization. The issue of crankshaft cracking was subsequently resolved on a long term basis by implementing several corrective measures. These measures included the minimization of fast diesel starts (identified as the main contributor to the cracking problem) and regular crankshaft inspections during plant outages to verify the absence of detectable cracks. These

measures are presently included in the SONGS 1 Technical Specifications.

Since the diesels were first installed in 1976-77, there have been very few occurrences of out of phase diesel synchronization with the main grid.

With SONGS 1 permanently shut down and defueled, long term integrity of the diesels is no longer required. Additionally, we anticipate that during the permanently-defueled mode, the diesels will not be required to perform a safety-related function and even if they were, the measures referred to above would be adequate to ensure continued diesel integrity.

9207054 Evaluate Need for Vibration Instrumentation on Diesel Oil Transfer Pump Modification

SOURCE: In a letter from R. M. Rosenblum (SCE) to the NRC on July 8, 1992, we committed to re-evaluate the need for modifications to the diesel fuel oil transfer pumps to permit vibration measurements. This was a FTOL Cycle 12 commitment which provided an alternative to the inservice testing requirements of Section XI of the ASME Code.

By our letter dated June 12, 1992, forwarding the Thirteenth Edition of the Integrated Implementation Schedule to the NRC, we had cancelled this modification as a result of the impending shutdown of Unit 1. In our July 8, 1992 letter, we opted to re-evaluate this modification.

REASON: The purpose of inservice testing to Section XI of the ASME Code (or to alternative requirements approved by the NRC) is to ensure continued safe operation of the components being tested after return to service. Since SONGS 1 has been permanently shut down and defueled, it is no longer required to implement Section XI of the ASME Code. Based on this, the above modification need not and will not be implemented.

9010049 Impact of Instrument Loop Uncertainties Evaluation on EOIs

SOURCE: NRC Inspection Report No. 90-11 was transmitted by a letter from R. P. Zimmerman (NRC) to H. B. Ray (SCE) on November 8, 1990. The inspection report identified a "Significant Issue." The "Significant Issue" was that we failed to ensure the inclusion of data generated from our review of harsh environment on safety related instrument loop uncertainties into the Emergency Operating Instructions (EOIs) if they are at variance with the current setpoints. We responded on January 28, 1991 by submitting our corrective action plan and a schedule.

REASON: SONGS 1 has been permanently shut down. Unit 1 EOIs are not applicable when the unit is maintained below Mode 3.

9102020 Revise EOI (Harsh Environment)

SOURCE: NRC Inspection Report No. 90-11 was transmitted by letter from R. P. Zimmerman (NRC) to H. B. Ray (SCE) on November 8, 1990. The inspection report required us to ensure that the harsh environment criteria were included in the Emergency Operating Instructions (EOIs) in brackets alongside the normal procedural acceptance criteria. We responded on January 28, 1991 by submitting our corrective action plan and a schedule to complete this by the end of the Cycle 12 refueling.

REASON: EOIs are not applicable when the unit is below Mode 3. With the permanent shut down of SONGS 1, no revisions to the SONGS 1 EOIs are necessary.

9102023 Access Port for CV-737A and B - EOI

SOURCE: NRC Inspection Report No. 90-11 was transmitted by letter from R. P. Zimmerman (NRC) to H. B. Ray (SCE) on November 8, 1990. The inspection report identified deficiencies in our EOIs and requested us to provide a corrective action plan to address these deficiencies. One of the deficiencies was that local operation of two component cooling water (CCW) valves was opined to be time-consuming since it required removing a sheet metal cover to gain access to and operate the vent valve actuators prior to repositioning of the valves. The inspection report proposed the addition of an access port for the vent valves. We responded on January 28, 1991 by submitting our corrective action plan. We proposed to add an access port to improve operator access to the valve by the end of Cycle 12.

REASON: The two CCW valves (CV-737A and CV-737B) are not required for operation of the CCW system. Adding an access port to the actuators of the two valves is not required to maintain SONGS 1 in a safe permanently-defueled condition.

9102030 Corrective Actions for EOI Inspection Report Attachment A Observations.

SOURCE: NRC Inspection Report No. 90-11 was transmitted by letter from R. P. Zimmerman (NRC) to H. B. Ray (SCE) on November 8, 1990. Attachment A to the Inspection Report documented 115 observations which resulted from the review and plant walkdown of selected Emergency Operating Instructions (EOIs). One of the observations concerned human factors related nomenclature. We responded to the inspection report on January 28, 1991 by proposing corrective actions and a schedule for each corrective action. Our letter

stated that the nomenclature issue would be resolved with our Control Room Design Review (CRDR) project which was scheduled for Cycle 12. We have completed all corrective actions, except those concerning the nomenclature issue, which will not be completed.

REASON: The CRDR will not be performed due to the permanent shutdown of SONGS 1. The NRC was notified of this in the SCE July 8, 1992 "TAC List Status" letter. The human factors related nomenclature issue deals with EOI procedure revisions. Since EOIs are not applicable below Mode 3 operation, this issue is closed for SONGS 1.

9111047 Evaluation of Controls Setpoints for Safety Related Equipment

SOURCE: The NRC performed an Electrical Safety System Functional Inspection (SSFI) on Units 2 and 3 in October/November 1989. Based on findings from that SSFI a commitment was made to re-evaluate the controls setpoints for all safety-related equipment after the Design Basis Document (DBD) program is completed on SONGS 1.

REASON: The DBD program for SONGS 1 has been terminated. The re-evaluation of the controls setpoints will not be done, since it is not required to maintain SONGS 1 in a safe permanently-defueled condition.

9205007 Consideration of Seismic Loading in MOV Calculations

SOURCE: Inspection Report 92-02 was transmitted by letter from R. P. Zimmerman (NRC) to H. B. Ray (SCE) on April 7, 1992. This inspection reviewed the Generic Letter (GL) 89-10 program for safety-related motor operated valves. Except for scope and schedule, the inspectors did not review the GL 89-10 program for Unit 1. We made the following commitment to resolve an NRC concern.

We performed a study on the effect of seismic loads on MOV performance. According to the study, a conservative estimate showed seismic loads to be only a few percent of the calculated minimum thrust requirements. We committed, however, to review the MOV calculations for required thrust, and for MOVs with "excess margin" less than 10% of the required minimum thrust, and to perform additional calculations to include the seismic loads.

REASON: For the reasons given in SCE to NRC letter dated January 13, 1993, regarding the SONGS 1 MOV testing program, the effect of seismic loads on MOV performance is a closed issue for SONGS 1.

COMMITMENTS THAT WILL BE COMPLETED

The following commitments have been or will be completed for SONGS 1.

9004262 Upgrade of the Computerized Fire Protection Impairment Program

SOURCE: LER 2-90-001 reported a Technical Specification violation had occurred on Unit 2. The incident occurred because the rooms identified to be protected by a certain fire door were incorrect. The correct rooms did not have any fire detection or suppression systems. These rooms should have had a continuous fire watch posted. One corrective action was to upgrade the computerized fire protection impairment program so it will be able to be used to provide the necessary data to personnel making fire equipment impairment evaluations without requiring reference to the UFHA and/or other controlled documents. This is a SONGS 1, 2, and 3 commitment and will be completed for SONGS 1 for areas with equipment that is required to be operable.

9207034 Station Procedures Compliance With SO123-0-20

SOURCE: LER 2-92-009 reported the emergency seal water isolation valve for saltwater cooling pump p112 (SONGS 2) was discovered in the closed rather than the open position. One of the corrective actions was to review appropriate station procedures to ensure that they are in compliance with the requirements specified in Operations Division Procedure SO123-0-20 for the manipulation of plant equipment. This is a SONGS 1, 2, and 3 programmatic commitment and it will be completed.

9206012 Evaluate NCR Process For Tracking Internal Commitments to NRC

SOURCE: NRC Inspection Report 92-15 was transmitted by letter from S. A. Richards (NRC) to H. B. Ray (SCE) dated May 22, 1992. This was a routine inspection conducted from March 11, 1992 through April 22, 1992. Several commitments were made by SCE as a result of this inspection, including the following:

> The NRC had a concern that the NCR program did not include any provisions to track internal commitments made in NCRs. We indicated that commitments are generally verified complete when the NCR is closed. However, there is nothing that links completion of the NCR to a specific completion date. As a result, it is possible that actions committed to in an NCR would not be completed in a timely manner. We committed to evaluate the NCR process to determine if any enhancement can be made.

9208013 Develop a Procedure for Cold Pulling Piping
9208014 Management Concern - Check Valve Maintenance

SOURCE: NRC Inspection Report 92-15 was transmitted from L. F. Miller (NRC) to H. B. Ray (SCE) on July 14, 1992. This inspection reviewed the program for inservice testing (IST) of check valves in safety-related systems. Except for general scope and schedule, the inspectors did not review the IST check valve program for Unit 1. We made several commitments (listed below) as a result of NRC concerns. These are programmatic commitments and they will be completed for SONGS 1, as applicable.

- The NRC noted that there is no requirement for engineering guidance or evaluation when cold pulling piping. We committed to develop a procedure to provide guidance for cold pulling piping. (9208013)

- The NRC reviewers noted that between September 21, 1990 and April 10, 1992, there was no documented evidence of management assessment involvement or overview of the check valve program activities. We committed to evaluate this concern. (9208014)

9209041 Evaluate Annual Radiological Effluent Monitoring Report Table I-2

SOURCE: A letter dated August 18, 1992 from J. H. Reese (NRC) to H. B. Ray (SCE) transmitted NRC Inspection Report No. 92-22. Several commitments were made by SCE as a result of this inspection, including the following:

- The 10CFR20 Appendix B limits of the SONGS 1 Annual Radiological Environmental Monitoring Report were in error. We agreed that the microcurie per liter should be in volumetric units of milliliters, and that the tables use is somewhat questionable due to the different measuring units (picocurie per cubic meter versus microcurie per liter, and picocurie per liter versus microcurie per milliliter). We committed to re-evaluate the arrangement of the table data.

9210018 Evaluate LLD Process to Ensure Compliance with ODCM

SOURCE: In the NRC Exit Interview held on August 28, 1992 we made the following commitment:

Evaluate lower limit of detection (LLD) calculation to determine if the process is in accordance with ODCM and takes into account effect of contamination on LLD.

9211009 Implement Fastener Corrosion Corrective Actions

SOURCE: On July 18, 1992, during routine Inspection 92-20, the NRC followed-up on open item 50-206/91-13-04, "Maintenance Program Implementation for Corroded Fasteners." This resulted in a commitment to implement corrective actions to ensure preservation of fasteners from corrosion.

After the PDTS are approved, this commitment will be re-evaluated. It may then be changed to include only those systems with fasteners that are required to maintain SONGS 1 in a safe permanently-defueled condition.

RCTS.AA2