

Southern California Edison Company

SCE

SAN ONOFRE NUCLEAR GENERATING STATION

P.O. BOX 128

SAN CLEMENTE, CALIFORNIA 92672

J. G. HAYNES
STATION MANAGER

March 21, 1984

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IF NO FILE COPY

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Attention: Mr. J. B. Martin, Regional Administrator

Dear Sir:

Subject: Docket Nos. 50-361 and 50-362
14-Day Follow-up Report
License Condition 2.C.(14)a and 2.C.(12)a
San Onofre Nuclear Generating Station, Units 2 and 3

Reference: Letter, J. G. Haynes (SCE) to J. B. Martin (NRC),
dated March 7, 1984

The referenced letter provided you with confirmation of our prompt notification pursuant to 10 CFR 50.36, 50.72, and License Condition 2.G to Facility Operating Licenses NPF-10 and NPF-15 for San Onofre Units 2 and 3, respectively, to the NRC on March 6 and 7, 1984, of reportable occurrences associated with the fire protection program. This letter provides the required 14-day follow-up report. In addition, we would like to provide a correction to item "a" in the referenced letter, in that the reference to cold shutdown should be changed to hot shutdown.

License Conditions 2.C.(14)a and 2.C.(12)a of Operating Licenses NPF-10 and NPF-15, respectively, require that SCE maintain in effect and fully implement the Fire Protection Plan as delineated in the Fire Hazards Analysis (FHA). As indicated in the referenced letter, during our continuing review (See LER 84-001, Docket No. 50-361) for the preparation of the updated Fire Hazards Analysis (FHA), and as a result of receiving and reviewing IE Information Notice (IN) 84-09, "Lessons Learned from NRC Inspections of Fire Protection Safe Shutdown Systems," we identified apparent discrepancies between the SCE Fire Protection Program and NRC requirements. SCE considers that many of the items identified as apparent discrepancies represent deviations from the specified NRC criteria which are technically acceptable and are consistent with what SCE believed to be the NRC-accepted design basis for the plant.

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Mr. J. B. Martin

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March 21, 1984

Our review into this area is continuing and has identified additional examples of discrepancies previously reported in LER 84-001 (Docket No. 50-361) involving cable separation and fire wraps. These items are still being evaluated, and will be discussed in detail in the 30-day LER that will be submitted by April 5, 1984. Corrective action required by the Technical Specifications (performance of an hourly firewatch or posting of a continuous firewatch) has been taken. Corrective action for discrepancies not requiring establishment of firewatches is being evaluated and will be implemented as part of the dispositioning of the Nonconformance Reports which document the discrepancies.

SCE believes that it is not the intent of License Condition 2.G to require the reporting of such incidents. The intent of License Condition 2.G has been discussed with NRR and, as a result, SCE will submit a request for license amendment to revise the current reporting requirements of the License Condition.

If you have any questions regarding the above, please so advise.

Sincerely,



cc: A. E. Chaffee (USNRC Resident Inspector, Units 1, 2 and 3)
J. P. Stewart (USNRC Resident Inspector, Units 2 and 3)