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 FACIL:50-361 San Onofre Nuclear Station, Unit 2, Southern Californ 05000361
 50-362 San Onofre Nuclear Station, Unit 3, Southern Californ 05000362
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 KNIGHTON,G.W. Licensing Branch 3

SUBJECT: Provides outline of util implementing procedures re
 upgrading emergency operating instructions, per Suppl 1 to
 NUREG-0737 & Generic Ltr 82-33.

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 TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737(Generic Ltr 82-33)

NOTES: J Hanchett 1cy PDR Documents. ELD Chandler 1cy. 05000361
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M.O. MEDFORD
MANAGER, NUCLEAR LICENSING

May 14, 1984

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Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

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

- References:
- A) Letter, D. G. Eisenhower, NRC, to All Licensees of Operating Reactors, Supplement 1 to NUREG-0737 - Requirements for Emergency Response Capability (Generic Letter No. 82-33), December 17, 1982
 - B) Letter, K. P. Baskin, Southern California Edison, to D. G. Eisenhower, NRC, Response to Generic Letter No. 82-33, May 13, 1983
 - C) Letter, G. W. Knighton, NRC, to K. P. Baskin, Southern California Edison, Issuance of Order Confirming Licensee Commitments on Emergency Response Capability, February 23, 1984

Reference A transmitted Supplement 1 to NUREG-0737 which provided clarification of NRC requirements for upgrading of Emergency Operating Procedures. Southern California Edison's (SCE) response to Reference A and a schedule for implementing upgraded Emergency Operating Instructions for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 was provided by Reference B. Emergency Operating Procedures, as entitled by the NRC, are identified as Emergency Operating Instructions (EOI's) in SCE's system of documents and procedures. The NRC confirmed SCE commitments concerning the implementation of the upgraded EOI's in Reference C.

SONGS Unit 2 License Condition 2C(19)d requires implementing Unit 2 upgraded EOI's prior to startup following the Unit 2 first refueling outage. Similarly, SONGS Unit 3 License Condition 2C(17)a requires implementing Unit 3 upgraded EOI's prior to startup following the Unit 3 first refueling outage. Consistent with the above referenced letters and with the Operating Licenses,

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May 14, 1984

SCE plans to implement SONGS Units 2 and 3 upgraded EOI's, concurrently, prior to startup following the first refueling outage of Unit 2. In addition, SONGS Units 2 and 3 Operating License Conditions 2C(19)o and 2C(17)h, respectively, require the Reactor Vessel Level Monitoring System (RVLMS), more specifically the Heated Junction Thermocouple (HJTC) system, to be installed and operable prior to startup following first refueling. In order to satisfy the SONGS RVLMS License Conditions the upgraded EOI's should also provide guidance for RVLMS operation.

The Combustion Engineering Owners Group (CEOG) Emergency Procedures Guidelines, CEN-152, Rev. 1, which would be utilized to upgrade the SONGS Units 2 and 3 EOI's, have been approved by the NRC; however, these guidelines do not provide guidance for the RVLMS operation. The Rev. 2 draft of CEN-152 which was informally submitted by the CEOG to the NRC on March 12, 1984 and currently scheduled to be formally submitted on May 14, 1984 contains the guidance required to incorporate use of the RVLMS into the upgraded EOI's. It is SCE's intention to upgrade the SONGS Units 2 and 3 EOI's based on the additional applicable RVLMS and Reactor Coolant Pump Trip 2/Leave 2 guidance contained in Rev. 2 to CEN-152. Even though Rev. 2 has not been approved by the NRC, SCE considers its use to be appropriate because Rev. 2 expands on the previously approved information in CEN-152, Rev. 1 and contains the guidance which allows SCE to address the RVLMS License Condition. In order to support SCE's approach, CE has been requested to prepare plant specific guidance to be used in converting the SONGS Units 2 and 3 EOI's consistent with the applicable RVLMS and Reactor Coolant Pump Trip 2/Leave 2 information contained in CEN-152, Rev. 2. The preparation of the upgraded EOI's will begin June 1, 1984 to allow sufficient time for verification and validation of the upgraded EOI's and operator training prior to startup following the Unit 2 refueling outage.

We realize the NRC schedule for approval of CEN-152, Rev. 2 may not support the June 1, 1984 schedule. Should CEN-152, Rev. 2 not be approved by the NRC in support of SCE's schedule for preparing the upgraded EOI's, it is requested that the NRC concur with our approach and/or identify any major NRC comments relative to Rev. 2 that should be incorporated in the SONGS upgraded EOI's. Once NRC approval is obtained on CEN-152, Rev. 2, SCE will incorporate appropriate changes, if any, into both Unit 2 and Unit 3 EOI's prior to startup following the next refueling outage which occurs six months or more after NRC approval of the Rev. 2 guidelines. If the NRC considers that the EOI's should not be upgraded until CEN-152, Rev. 2 is approved or that the EOI's be upgraded but guidance for RVLMS operation be deferred until Rev. 2 is approved, the NRC is requested to authorize an extension of the applicable License Conditions for SONGS Units 2 and 3 to require implementation prior to startup following the next refueling outage which occurs six months or more after NRC approval of the Rev. 2 guidelines.

May 14, 1984

SCE considers that the approach outlined above is a reasonable way to proceed so that SCE can satisfy the License Conditions for implementing upgraded EOI's and for RVLMS operability prior to startup following first refueling of Unit 2. We are anxious to obtain NRC comments and/or concurrence with this approach. Accordingly, the NRC is requested to respond to this letter prior to the June 1, 1984 initiation date for preparing EOI's.

If you have any questions, please contact me.

Very truly yours,

FR Kelly
for McHale

cc: Mr. H. Rood, Project Manager
Licensing Branch 3
Mr. A. E. Chaffee
NRC Site Inspector