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 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Requests resolution of outstanding deviations from NRC fire protection requirements. Addl deviations, exemptions &/or amends to license will be submitted when Generic Ltr 85-01, "NRC Fire Protection Policy Steering Committee Rept,"

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NOTES: J Hanchett 1cy PDR Documents. ELD Chandler 1cy. 05000361
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March 25, 1985

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

The purpose of this letter is to request Nuclear Reactor Regulation (NRR) resolution of outstanding deviations to NRC Fire Protection Requirements for San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2&3). Southern California Edison Company (SCE) took the initiative in 1983 to perform a total revalidation of the Fire Protection Program for SONGS 2 and 3 in conjunction with the effort to update the Fire Hazards Analysis (Updated FHA) in accordance with 10 CFR 50.71(e).

The Updated FHA includes a Design Basis Table that provides a direct and detailed comparison of the SONGS 2 and 3 Fire Protection Program to the specific requirements of NRC Branch Technical Position (BTP) APCSB 9.5-1, Appendix A and 10 CFR 50, Appendix R, Sections III.G, J and O. The 10 CFR 50 Appendix R Design Basis Table identifies specific deviations from the literal requirements of Sections III.G, J and O. Deviation requests justifying the deviations that had not been specifically identified previously were provided as enclosures to the March 19, 1984 letter from SCE to the NRC. That letter also transmitted to the NRC the Updated FHA for SONGS 2 and 3.

A meeting to discuss the eight deviations identified in the March 19 letter was held with the NRC Staff in May 1984. Subsequently, the NRC staff requested additional information on five of the eight deviations in order to complete the staff review. Accordingly, additional information on those five deviations was provided by SCE in a letter to the NRC dated September 25, 1984.

We have been informed that NRR review of SONGS 2 and 3 deviations is considered lower priority than NTOL Fire Protection reviews and that NRR review of SONGS 2 and 3 deviations is currently scheduled for August 1985 and may slip beyond that date. SCE feels that, prior to NRR resolution of the outstanding deviation requests, it will be difficult to fully address the fire protection inspection criteria.

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March 25, 1985

Generic Letter 85-01, NRC Fire Protection Policy Steering Committee Report, was issued for comment in January 1985. Generic Letter 85-01 examines licensing, inspection and technical issues and develops policy recommendations aimed at expediting Appendix R compliance. Generic Letter 85-01 also takes precedence over all previous NRC guidance documents. SCE is currently evaluating Generic Letter 85-01 for impact to SONGS 2 and 3.

Generic Letter 85-01 specifies that Appendix R inspections will be conducted in 1985 for at least one site per Licensee. While SCE intends to respond in a timely manner to Generic Letter 85-01 once it is issued, it is difficult to implement appropriate actions without NRR resolution of previously submitted deviation requests. Once Generic Letter 85-01 is issued formally, SCE intends to formally submit any additional deviations, exemptions and/or license amendments that are required.

Therefore, SCE requests that NRR expedite review of previously identified deviations for SONGS 2 and 3 such that the review schedule is consistent with the NRC Appendix R inspection schedule for SONGS 2 and 3.

If you have any questions regarding this matter, please call me.

Very truly yours,



cc: H. Rood, NRC Project Manager, San Onofre Units 2 and 3
J. B. Martin, NRC Region V Administrator
F. R. Huey, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3