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SUBJECT: Forwards changes to FSAR to note elimination of N-1 control rod test. Mods will be formally submitted in upcoming FSAR amend.

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NOTES: 3 3

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K. P. BASKIN  
MANAGER OF NUCLEAR ENGINEERING,  
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June 23, 1982

TELEPHONE  
(213) 572-1401

Director, Office of Nuclear Reactor Regulation  
Attention: Mr. Frank Miraglia, 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

Condition C.18 to Operating License NPF-10 requires prior Nuclear Regulatory Commission (NRC) approval before modifying the post-fuel loading initial test program as set forth in Section 14 of the San Onofre Nuclear Generating Station, Unit 2 (SONGS 2) Final Safety Analysis Report (FSAR). In this regard, a series of telephone conversations was held between staff members of the NRC and Southern California Edison Company (SCE) during the period of June 10 to June 16, 1982. The phone calls were to discuss SCE's request for NRC approval to eliminate the (N-1) control rod test from the low power physics test program for SONGS 2.

SCE's objection to the (N-1) control rod test is that in the test configuration, the reactor is vulnerable to, among other things, overcooling transients. The positive reactivity added by a cooldown may be larger than the negative reactivity added by tripping the withdrawn highest worth rod. Substantial fuel damage could occur before enough boron is injected to shut the reactor down. Since very little burnup would have been accumulated by the core, there would be no radioactive dose in the event of such fuel damage. The economic and licensing impact, however, of such a situation could be significant.

In a phone conversation on June 16, Mr. Daniel Fieno, NRC Core Performance Branch, advised SCE that the NRC agrees that the (N-1) control rod test can be deleted from the SONGS 2 startup test program as long as the other low power physics tests conducted at Arkansas Nuclear One - Unit 2 (ANO-2) are also conducted at SONGS 2. It is SCE's intention to conduct a low power physics test program that is the same as was conducted at ANO-2 with the exception of the elimination of the (N-1) control rod test (the boron concentration for related tests will be limited to a minimum value of 200 ppm).

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Mr. Frank Miraglia

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June 23, 1982

This agreement results in a change to the SONGS 2&3 FSAR to note the elimination of the (N-1) control rod test. The affected page (page 14.2-17), marked to indicate the required change, is enclosed for your information and will be formally submitted to the NRC in an upcoming FSAR amendment.

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

Very truly yours,

*KP Baslow*

Enclosure

cc: R. H. Engelken, NRC Region V (w/encl)

SPECIFIC INFORMATION  
TO BE INCLUDED IN FSAR

- b. Past testing at other C-E plants has shown that full-flow CEA drop times are slower and therefore more conservative than no-flow drop times.
- c. Repeated starts and stops of the reactor coolant pumps (RCPs), such as are necessary to maintain RCS temperature within its test limits, are harmful to the RCP seals and are therefore not recommended by the vendor.
- d. Technical specifications prohibit criticality under no-flow conditions.

14.2.7.2.4.2 Power Ascension Testing Plateaus. Standard plateaus during power ascension for C-E reactors are 20, 50, 80 and 100% of rated power. These plateaus will be used for San Onofre Units 2&3 startup.

14.2.7.2.4.3 Low Power Physics and Power Ascension Testing. Low power physics and power ascension testing for Unit 2 will be consistent with the recommendations of Regulatory Guide 1.68. Unit 2 is the lead C-E 3410 Mwt plant; therefore, the Unit 2 test program will be a first-of-a-kind program. Since Units 2 and 3 are essentially identical, tests that are not necessary to assure system operation or verify fuel and CEA loadings will be reduced in scope or deleted from the test program for Unit 3 as described below. The essentially identical nature of the two units will be demonstrated by an analysis of CEA symmetry checks, CEA group worths, and critical boron concentrations during the low power physics tests, and by analysis of incore detector data during the power ascension test program. The Unit 3 test program will be to the same level of detail as has previously been performed on non first-of-a-kind C-E plants, rather than the first of a kind program that will be performed for Unit 2.

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The tests that will be deleted for Unit 3 are listed below:

- A. Initial criticality of Unit 3 will be at 545F, 2250 lb/in.<sup>2</sup>a, deleting all low temperature physics measurements.
- B. Dropped and ejected CEA tests during both low power physics and power ascension.

~~C. The stuck CEA test will be deleted and the value measured for Unit 2 or the calculated value, whichever is larger, will be used.~~

~~B.C~~ Xenon oscillation control (PLCEA) test will be deleted.

~~E.D~~ During power ascension testing, the following tests, which are relatively plant independent, will be reduced in scope:

1. Steady state core performance tests.
2. Inter-comparison of PPS, CPC, and process computer inputs and outputs test.

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