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SUBJECT: Comments on NRC Safety evaluation re Amend 8 to License
 NPF-10. Amend changed date for operability of post-accident
 sampling sys. Plant expected to return to power by early
 Jan 1983.

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Southern California Edison Company



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December 21, 1982

K. P. BASKIN
MANAGER OF NUCLEAR ENGINEERING,
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TELEPHONE
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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 from K. P. Baskin (SCE) to G. W. Knighton (NRC), dated November 30, 1982
 - B. Letter from D. G. Eisenhut (NRC) to R. Dietch (SCE), dated September 17, 1982
 - C. Letters from K. P. Baskin (SCE), to F. A. Miraglia (NRC), dated September 11, 14, and 15 1982.

Reference "B" enclosed the NRC safety evaluation supporting Amendment No. 8 to Facility Operating License NPF-10 for San Onofre Nuclear Generating Station, Unit 2 (SONGS 2). Amendment No. 8 changed the date for operability of the post-accident sampling system (PASS) and for implementation of the post-accident sampling program from "prior to exceeding five (5) percent power" to "January 1, 1983". Amendment No. 8 was responsive to Reference "C" which requested the NRC action because of a number of problems that collectively prevented Southern California Edison Company (SCE) from declaring the PASS operable.

Improvements and modifications, as discussed in Reference "C" and in a meeting with NRC staff on September 13, 1982, have been completed. Testing of each individual item has also been completed. On the day that the PASS Demonstration Test was to be performed, SONGS 2 tripped while operating at the fifty percent power level. The plant remains in a shutdown condition to replace reactor coolant pump seals. With the plant shutdown, it is not possible to complete the PASS Demonstration Test or to implement the enhanced operator training on the system after the demonstration test.

Boo!

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PDR

Mr. George W. Knighton

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December 21, 1982

SONGS 2 is expected to return to power by early January, 1983 at which time the PASS Demonstration Test will be completed and operator training will be conducted. In the meantime SCE considers the PASS to be operable and License Condition 2.C(19)i to be satisfied.

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

Very truly yours,



cc: H. Rood, NRC