

Southern California Edison Company



P. O. BOX 800
2244 WALNUT GROVE AVENUE
ROSEMEAD, CALIFORNIA 91770

K. P. BASKIN
MANAGER OF NUCLEAR ENGINEERING,
SAFETY AND LICENSING

TELEPHONE
(213) 572-1401

May 20, 1983

Director of Nuclear Reactor Regulation
Attention: D. M. Crutchfield, Chief
Operating Reactors Branch No. 5
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206
Environmental Qualification of Electrical Equipment
San Onofre Nuclear Generating Station
Unit 1

By Federal Register Notice dated January 21, 1983 the environmental qualification rule was published. The effective date of the rule was February 22, 1983. 10 CFR 50.49(g) of the rule requires that all licensees inform the NRC of the qualified equipment which falls under the scope of the rule and identify a schedule for qualification or replacement of the remaining equipment. This letter is being submitted in response to 10 CFR 50.49(g).

Our letter of October 31, 1980 provided you with our listing of safety related electrical equipment which would be required to function following a LOCA, MSLB or FWLB. This listing included equipment located in a harsh and mild environment. It was subsequently supplemented by our November 4, 1981 letter to include additional equipment.

The NRC's SER dated November 30, 1982 included the Franklin Research Center TER dated June 23, 1982. The TER indicated the following equipment as being qualified based on the information provided by our October 31, 1980 submittal:

- Item No. 39 & 40. Raychem Cable Splices
- 45. Conax Penetrations
- 54. Raychem Cable
- 56. Rockbestos Cable

The TER indicated that all remaining equipment required additional information to establish qualification and did not identify any equipment as not being qualified. We are continuing our efforts on the remaining equipment to obtain sufficient documentation to demonstrate qualification prior to the March 31, 1985 deadline. In the event we are unable to qualify equipment, you will be advised of our course of action which may include a request for extension or replacement.

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May 20, 1983

In addition to the requirement of 10 CFR 50.49(g) you forwarded to us by letter dated April 1, 1983 a clarification of the safety evaluation report. That clarification letter requested that we indicate whether our previous submittals were in compliance with 10 CFR 50.49(a) and (b) and that we should identify how 10 CFR 50.49.b(2) equipment was identified.

The October 31, 1980 submittal which identified the equipment required for accident mitigation complies with 10 CFR 50.49(a), (b)(1) and (b)(3). The submittal does not comply with 10 CFR 50.49(b)(2). The identification of nonsafety-related equipment whose failure under postulated environmental conditions could prevent the performance of a safety function was not included in the scope of the October 31, 1980 submittal. As part of a preliminary review for Fire Protection, we have assessed the affects of the failure of nonsafety-related equipment on safely bringing the reactor to a cold shutdown. During this review no equipment was identified that would affect a safe shutdown. This review will be finalized as part of the associated circuits review for Fire Protection and will include the review of nonsafety-related equipment. If during the course of the review, nonsafety-related equipment is identified which affects the completion of a safety function, we will notify you and inform you of the proposed corrective action which may include qualification prior to March 31, 1985 or replacement.

With regard to Section 10 CFR 50.49(b)(3), post-accident monitoring equipment has been identified as part of the environmental qualification program in our October 31, 1980 and November 4, 1981 submittals or installed as part of TMI modifications and identified in our July 2, 1982 submittal. It should be noted that additional monitoring equipment may be identified for qualification or installation as part of the NUREG-0737 Supplement 1 work.

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

Very truly yours,

W P Boston

Enclosures