

Southern California Edison Company



P. O. BOX 800

2244 WALNUT GROVE AVENUE

ROSEMEAD, CALIFORNIA 91770

ROBERT DIETCH
VICE PRESIDENT

TELEPHONE
213-572-4144

June 10, 1983

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

Subject: Docket No. 50-206
San Onofre Nuclear Generating Station
Unit 1

As you know, San Onofre Unit 1 has been shutdown since February 27, 1982 to complete the seismic upgrading of structures, systems and components. In mid-February, 1983, we initiated discussions with members of your staff regarding (1) a "Plan for Early Return to Power," and (2) a "Plan for Managing Plant Retrofit." The basic objective of each of these plans is to assist in reducing the capital expenditures and to improve the capacity factor for San Onofre Unit 1. The description and basic premise for each of these plans is summarized below:

1. The "Plan for Early Return to Power" describes the scope of modifications which should be implemented as part of the seismic reevaluation program prior to the return to power of San Onofre Unit 1. The basic premise of this plan is that the modifications are limited to all structures and systems the failure of which could cause an accident and/or whose function is required to get to a safe cold shutdown following a 0.67g earthquake. Items not required to achieve safe cold shutdown will be deferred. In such condition, the plant can return to power without undue risk to the health and safety of the public even considering the possibility of a major earthquake at the plant site.
2. The "Plan for Managing Plant Retrofit" describes the methodology and techniques which will be utilized to rationally establish a long-term integrated plant modification upgrade schedule. The basic premise of this plan is that modifications (i.e., those not required to be implemented during the current outage) will be completed on a schedule which provides the greatest benefit toward improving plant safety and/or reliability.

8306140019 830610
PDR ADOCK 05000206
P PDR

ADCK
1/0



The purpose of this letter is to discuss the implementation of each of these plans as they relate to the resumption of power operation at San Onofre Unit 1. Specifically, the following actions will be taken:

1. work closely with the NRC to obtain concurrence on each of the plans,
2. continue to perform work (i.e., surveillance, maintenance and refurbishment) required to safely maintain the plant in cold shutdown,
3. continue to work on the modifications which must be implemented this outage relating to Three Mile Island Category B Items as specified in Confirmatory Order dated March 14, 1983 and Fire Protection Appendix R modifications as specified in Supplement 1 to the Fire Protection Safety Evaluation Report dated February 4, 1981, with the exception of those associated with safe shutdown.
4. continue to work on the SEP, including the Integrated Assessment, in order to identify the necessary modifications which must be implemented, and
5. defer all other work which is not covered by Items 2, 3, 4 and 5 above until such time as NRC concurrence is obtained on each of the plans.

Relative to Item 5 above, it will be necessary to work with the NRC to issue an exemption to defer the implementation of (1) Fire Protection Appendix R Safe Shutdown modifications required by 10 CFR 50.48, and (2) Environmental Qualification submittals and modifications required by 10 CFR 50.49, to coincide with the schedules agreed upon in the "Plan for Managing Plant Retrofit." It has been determined that all other work covered by Item 6 above is (or will be) based on schedules negotiated with the NRC and these schedules will be renegotiated and agreed upon in the "Plan for Managing Plant Retrofit."

The actions discussed above will 1) assure that we can continue to safely maintain the plant in cold shutdown, and (2) establish a long-term integrated plant modification upgrade schedule that provides a greater benefit to improving plant safety and/or reliability while optimizing the use of SCE and NRC resources. Based on recent NRC activities related to (1) Supplement 1 to NUREG-0737, (2) instrumentation for detection of inadequate core cooling, and (3) proposed rulemaking on safety goals and backfitting, the actions discussed above are consistent with the regulatory trend toward adopting a plan to establish realistic plant specific integrated schedules that take into account the unique aspects of the work at each plant.

Mr. H. R. Denton

-3-

SCE

We look forward to working with the NRC in an effort to reach agreement on the aforementioned plans. If you wish to further discuss the information provided above, please let me know.

Very truly yours,

Robert Ditch