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September 2, 1983

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

Gentlemen:

Subject: Docket No. 50-206
Integrated Living Schedule Methodology
San Onofre Nuclear Generating Station
Unit 1

References: A. Letter, Robert Dietch, SCE, to H. R. Denton, NRC, dated June 17, 1983

B. Letter, D. G. Eisenhut, NRC, to R. Dietch, SCE, dated August 1, 1983

In Reference A, it was indicated that an Integrated Living Schedule (ILS) would be developed to stabilize and allow SCE to better control the backfit process at San Onofre Unit 1. Reference B provided your agreement with the general approach to the ILS.

Enclosed are ten copies of our proposed methodology to be used in developing the ILS. As indicated in the enclosure, the final result of the ILS will be a long term schedule for implementation of backfits based on 18 month operating cycles and 3 month refueling/backfit outages. The implementation of this program will also assist in reducing capital expenditures and improving the capacity factor for San Onofre Unit 1.

The schedule for a particular modification will depend on two factors:

1. Potential for Enhancing Safe Plant Operation -- Using the methodology described in the enclosure, backfits will be ranked according to their relative potential for enhancing safe plant operation, and

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2. Normal Scheduling Constraints -- The backfits with the highest rank from 1 above will be scheduled for implementation based on normal scheduling constraints such as procurement lead time, outage length, manpower resources, site congestion, capital expenditures, etc.

As described in the enclosure, the relative potential for enhancing safe plant operation will depend on an appropriate selection of evaluation criteria. In order to facilitate the evaluation process it is necessary to have your concurrence on the proposed criteria as soon as possible. Accordingly, we are prepared to meet with the Regulatory Staff to support their review and to obtain their agreement on the criteria.

This submittal contains information proprietary to Westinghouse Electric Corporation (Appendix 1 to Enclosure 1) and is supported by an original affidavit signed by Westinghouse, the owners of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.790 of the Commission's regulations.

Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.790 of the commission's regulations. Correspondence with respect to the proprietary aspect of this applciation for withholding or the supporting Westinghouse affidavit should reference CAW-83-73 and should be addressed to R. A. Wiesemann, Manager, Regulatory and Legislative Affairs, Westinghouse Electric Corporation, P.O. Box 355, Pittsburgh, Pennsylvania, 15230.

If you have any questions on this matter or would like additional information, please let me know.

Very truly yours,

Kenneth P Baskin

Kenneth P. Baskin
Vice President

Enclosures
1. Methodology for Development of an Integrated Living Schedule
2. Affidavit for withholding from public disclosure

Enclosure 1

METHODOLOGY FOR DEVELOPMENT OF AN INTEGRATED LIVING SCHEDULE SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 1

INTRODUCTION

This document describes the methodology to be used in preparing an Integrated Living Schedule (ILS) for the San Onofre Nuclear Generating Station Unit 1 (SONGS 1). The implementation schedule for capital backfits will be based primarily on the priority assigned to projects using the "Westinghouse Analytical Ranking Process as Applied to SONGS Unit 1." This method is described in detail in Appendix 1.

The ILS is "Integrated" in that it considers all capital projects in one scheduling process; is "Living" because it can be changed when new projects are identified; and is a "Schedule" of all the projects for as long a period of time as required for implementation subject to plant specific constraints.

PURPOSE

The purpose of the ILS is to provide a stable and controllable method for implementing backfits based on their potential to enhance the safe operation of the unit. The plan is premised on eighteen month cycles and three month outages.

SCOPE

The ILS will provide a schedule for all capital backfits currently identified for implementation. Operation and Maintenance projects will not be included due to the necessity of their immediate implementation. Those projects requested for the purpose of improving availability, reliability and facilitating operation and maintenance will be included in the ILS process along with backfits of regulatory origin. As new projects are identified for implementation they too will be subject to the process herein described and their implementation dates will be established accordingly.

DETERMINATION OF RELATIVE POTENTIAL FOR ENHANCING SAFE PLANT OPERATION

Using the Westinghouse process, the capital backfits will be ranked according to their relative potential to enhance safe plant operation. This will assure that the scheduling process will consider the implementation of the projects with the greatest safety potential first.

SCHEDULING

Existing Projects

The projects, once ranked, will be scheduled using normal techniques and constraints. The top projects on each of the lists, regulatory related and plant betterment, will have detailed schedules developed in order to determine their lead times for implementation. The maximum number of projects with lead times sufficient to allow implementation in the next scheduled outage without violating normal scheduling constraints will be scheduled for implementation. Should a project which was ranked high using the Westinghouse Process not be able to meet the constraints, then it will either be broken into subsets, some of which can be implemented, or the project will be scheduled for implementation during a subsequent outage.

Future Projects

Realizing that once the initial schedule has been developed that additional projects may be identified (both regulatory and betterment projects), this process allows for quick evaluation of those projects to determine their rank, and if high, their immediate implementation schedule.

CONCLUSION

The final result of the scheduling process will be an implementation schedule for all capital backfit projects. Priority will be given to those projects that are ranked high using the Westinghouse process. Those projects with lower ranking or that would cause the constraints of the schedule to be exceeded will be identified for implementation in future outages.

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