

BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of SOUTHERN )  
CALIFORNIA EDISON COMPANY and )  
SAN DIEGO GAS & ELECTRIC COMPANY )  
(San Onofre Nuclear Generating )  
Station, Unit No. 1) )  
\_\_\_\_\_ )

DOCKET NO. 50-206

ANSWER TO ORDER TO  
SHOW CAUSE

**ORIGINAL**

SOUTHERN CALIFORNIA EDISON COMPANY on behalf of SAN DIEGO GAS AND ELECTRIC COMPANY and itself, licensees for San Onofre Nuclear Generating Station, Unit No. 1 hereby responds pursuant to 10 CFR §2.202 to the Order to Show Cause ("OSC") issued in the above docket on January 2, 1980:

I

Answering Paragraph I of the Order to Show Cause Licensees allege that Provisional Operating License No. DPR-13 was issued to Licensees Southern California Edison Company and San Diego Gas & Electric Company to operate San Onofre Nuclear Generating Station, Unit No. 1 ("SONGS Unit 1") and that Southern California Edison Company is the operator of that facility and submits this Answer in such capacity. Save and except the above allegation, Licensees admit the contents of Paragraph I.

II

Answering Paragraph II of the OSC, Southern California Edison Company ("Licensee") admits the allegations of Paragraph II.

III

In response to Paragraph III, of the OSC Licensee admits it has committed to implement each "Category A" requirement

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albeit not completely by January 31, 1980. Licensee has no information or belief concerning the commitments of other licensees nor the delivery dates for equipment ordered by other licensees and on that basis denies said allegations. Licensee admits that in some instances thirty days after delivery of equipment is a practical time period during which equipment necessary for "Category A" actions can be installed but denies that all such necessary equipment can be received by licensee prior to June 1, 1980. As set forth in the "Declaration of D. K. Nelson," which is attached hereto as Exhibit A and by this reference incorporated herein as though set forth in full, all necessary equipment for "Category A" actions will not be available to licensee by June 1, 1980. 1/

IV

Further answering Paragraph III of the OSC, licensee has been informed and is aware that the Pacific Northwest region of the Western System Coordinating Council ("WSCC") is experiencing

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1/ In responding to the Order to Show Cause licensees have assumed that, as indicated in Paragraph IV of the OSC, the requirement of 2.1.7.a of NUREG-0578 is not within the scope of this OSC. Licensees further assume and respond assuming that operability of individual valves following containment isolation reset is considered to be Category A requirement. Licensees, in fact, believe it a matter related to Lessons Learned §2.1.4 but was not specifically identified as a requirement in NUREG-0578, as supplemented by letters dated September 13, 1979 and October 30, 1979. If NRC agrees that operability of individual valves following containment isolation reset is not a specified requirement of Lessons Learned §2.1.4, licensees have no equipment availability problems with respect to the January 31, 1980 date.

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reliability problems.

The "Affidavit of M. D. Whyte" attached hereto as Exhibit B, and by this reference incorporated herein as though set forth in full concludes that a February 1980 shutdown of San Onofre Nuclear Generating Station, Unit No. 1 would adversely impact the reliability of the combined electric power systems of the State of California and reduce California's ability to aid the Pacific Northwest with respect to its reliability problems. As previously stated, WSCC concludes that based on reliability considerations, the shutdown of SONGS Unit 1 for implementing of Category A action items and the shutdown for refueling now scheduled for April 1, 1980 should be combined and scheduled for March 15, 1980.

Attached hereto as Exhibit C, and by this reference incorporated herein as though set forth in full is a letter from Mr. James L. Mulloy, Chairman, Western System Coordinating Council to Mr. M. D. Whyte, Manager of Electric System Planning for Southern California Edison Company. Exhibit C reflects WSCC's conclusion "that an accelerated commencement of the scheduled refueling outage from early April to mid-March to accommodate both refueling and the retrofit simultaneously would enhance the reliability of the California and Northwest systems during a period of tight margins."

V

Licensee denies that continued operation of Unit 1 beyond June 1, 1980, in the absence of complete satisfaction of the "Category A" actions would pose a threat to the public health

and safety. For the reasons set forth in the "Declaration of J. G. Haynes," which is attached hereto as Exhibit D and by this reference incorporated herein as though set forth in full, the inability to implement modifications before June 1, 1980, because of unavailability of equipment does not pose a threat to the public health and safety and certainly does not warrant a shutdown of the facility.

VI

In the event this response and proposed relief is not found acceptable, licensee hereby reserves the right to demand a hearing on all issues raised by the Order to Show Cause.

WHEREFORE: Licensees Southern California Edison Company and San Diego Gas & Electric Company request relief from the Order to Show Cause as follows:

- (1) That due to reliability considerations, the earliest date for shutdown of San Onofre Unit No. 1 to effectuate the "Category A" action items be March 15, 1980;
- (2) That implementation of all "Category A" actions to San Onofre Unit No. 1 shall be completed during the shutdown commencing March 15, 1980, except those actions described in Exhibit A for which equipment is unavailable during said shutdown period;
- (3) That "Category A" actions which cannot be implemented because of equipment unavailability during the March 15, 1980 shutdown be implemented within thirty (30) days of delivery of said equipment to licensee;
- (4) That in the event the above-requested relief is not

acceptable, licensee reserves the right to demand a hearing on all contested issues arising out of the Order to Show Cause.

DATED: January 18, 1980

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By

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David R. Pigott  
One of Counsel for  
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Edison Company and  
San Diego Gas &  
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VERIFICATION

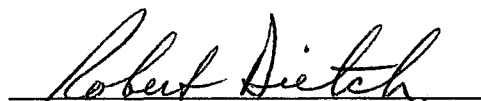
ROBERT DIETCH, says:

(1) That I am an officer, Vice President, Nuclear Engineering and Operations of Southern California Edison Company.

(2) That I am authorized to execute a verification of the foregoing ANSWER TO ORDER TO SHOW CAUSE.

(3) That I affirm under penalty of perjury that to the best of my knowledge, information, and belief the contents of the foregoing ANSWER TO ORDER TO SHOW CAUSE are true and correct.

Executed this 19 day of January, 1980, at  
Villa Park, California.



ROBERT DIETCH

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of SOUTHERN CALIFORNIA EDISON )  
COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY )  
(San Onofre Nuclear Generating Station Unit )  
No. 1) )  
\_\_\_\_\_ )

Docket No. 50-206

CERTIFICATE OF SERVICE

I hereby certify that a copy of Answer to Order to Show Cause was served on the following by deposit in the United States mail, postage prepaid, on the 20<sup>th</sup> day of January, 1980.

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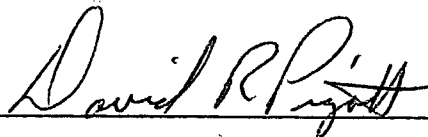
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