DECLARATION OF D. K. NELSON

I, D. K. Nelson, declare:

(1) That I am an employee of Southern California Edison Company. I am the Project Manager, San Onofre Unit 1 Retrofit Projects and in that capacity I am responsible for the management of all aspects of preliminary engineering, final design, procurement, construction and start-up of Engineering and Construction Department projects at San Onofre Unit 1. Engineering, procurement, and construction activities for physical modifications to San Onofre Unit 1 as determined to be required for implementation of Lessons Learned Short Term requirements has been, and continues to be, under my direction and supervision. If called as a witness, I could testify concerning those activities including those summarized below.

(2) By letter dated January 2, 1980 from Harold R. Denton of the Nuclear Regulatory Commission to Mr. James H. Drake of Southern California Edison, the Company was forwarded a Show Cause Order of that same date regarding the implementation of Lessons Learned Short Term (Category A) requirements at San Onofre Unit 1. That Order indicated that San Onofre Unit 1 should be shutdown by January 31, 1980 for the purpose of implementing specified requirements, except those for which necessary equipment was shown to be unavailable, unless shutdown would severely impact the power system reliability in the Pacific Northwest as determined by the Western Systems

Exhibit A

Coordinating Council. Licensees have elected to request that implementation of Category A requirements be deferred beyond January 31, 1980, based on system reliability considerations presented in a January 14, 1980 letter from R. Dietch of Southern California Edison to Mr. Harold R. Denton of the Nuclear Regulatory Commission. Further, the Company has identified the inability, based on information currently available, to implement modifications requested by representatives of the Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation Staff, during telephone discussions during the month of December 1979 which are related to the Lessons Learned Short Term requirements identified as Section 2.1.4, Diverse Containment Isolation, by June 1, 1980.

(3) Our letters dated October 17, 1979 and November 21, 1979 provided our commitments to implement the requirements set forth in NUREG-0578 Lessons Learned Item 2.1.4, Containment Isolation Provisions for PWRs and BWRs, as clarified by the NRC letter dated October 30, 1979. In late November 1979 and December 1979 numerous telephone conversations were held with representatives of the NRC staff to discuss the information contained in our letters. During a telephone conversation in December 1979, the NRC staff requested the implementation of modifications related to NUREG-0578, Item 2.1.4, which were not addressed in our letters. Our December 14, 1979 letter provided our commitments to also implement

these modifications and identified the equipment availability problems associated with procurement of containment electrical penetrations required to provide the capability to open automatically actuated containment isolation valves individually following reset and/or override of the containment isolation signal.

Based on our December 14, 1979 letter, engineering and design activities were initiated to fully identify the components/systems affected, number of penetrations required, number of existing penetrations available, design details for the new penetrations, etc. Our letter dated January 17, 1980 provided an evaluation of essential/non-essential systems as required by NUREG-0578 Lessons Learned Item 2.1.4. That letter identified the systems automatically isolated on a containment isolation signal and those which should be provided with the capability to reopen on an individual basis. However, we indicated that until NRC staff approval is obtained we were proceeding with engineering and design activities to provide the capability to reopen all automatically activated containment isolation valves individually. Accordingly, preliminary engineering and design activities are continuing to review electrical and control drawings for verification, to identify interfaces, to develop cable block diagrams, to develop layouts, etc. We currently estimate that

we will require until March 17, 1980 (eight weeks) to complete the preliminary engineering activities, such as the review of existing drawings, field verification to establish the number of those undamaged penetrations which may be used and the establishment of design details for the new penetrations, necessary to procure the required containment electrical penetrations. In parallel with these activities, a procurement document package (i.e., design specification and purchase order) will be prepared and issued for fabrication and delivery of the required penetrations. It is estimated that we require until March 17, 1980 (eight weeks) to prepare and issue the procurement document package.

(4) Subsequent to submittal of our December 14, 1979 letter, four manufacturers were considered as potential suppliers of the required penetrations. The manufacturers were Conax, Westinghouse, Amphenol and ITT Cannon. Based on our contacts, we believe both Conax and Westinghouse can provide fully qualified penetrations in 12 months from the date of receipt of a purchase order. In addition, both Conax and Westinghouse have indicated that a possibility may exist for rearranging their manufacturing schedules for other clients, thereby improving the fabrication and delivery schedule for San Onofre Unit 1 to five months and eight months, respectively. Based on our contacts with Amphenol, we believe that penetrations can be provided within 40 to 48

weeks from the date of receipt of a purchase order; however, based on our past experiences with Amphenol, it is uncertain whether they can provide fully qualified penetrations within this time frame. With respect to ITT Cannon, direct contact was not made; however, based on experience on the Palo Verde Nuclear Generating Station Project, ITT Cannon could not provide fully qualified penetrations for that project as contracted, and Conax was selected as the back-up vendor. Accordingly, Conax and Westinghouse will be the only manufacturers considered as potential suppliers of the required penetrations. We will continue to pursue the possibility of expediting the procurement of required penetrations.

(5) As discussed above, our January 17, 1980 letter identified systems which should be provided with the capability to reopen containment isolation valves individually. These systems are limited to those which might be required for long term recovery or diagnostic aid. If the NRC staff approves this approach, the number of components/ systems affected would be minimized; however, the need for new containment electrical penetrations even under these circumstances cannot be determined until completion of the preliminary engineering and design activities discussed in (1) above.

(6) Therefore, it is my conclusion and professional opinion that (a) based on information available at this time,

implementation of modifications to provide the capability for individual valve operability following containment isolation signal reset and/or override cannot be completed prior to June 1, 1980 as a result of problems of equipment availability, and (b) all aspects of preliminary engineering, final design, and procurement activities as discussed above are being diligently pursued such that implementation can be achieved as quickly as is practicable.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 18th day of January, 1980, at Rosemead, California.

D. K. NELSON

Exhibit A