



SOUTHERN CALIFORNIA
EDISON

An EDISON INTERNATIONALSM Company

Dwight E. Nunn
Vice President

September 13, 1999

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Subject: **Docket Nos. 50-206, 50-361, and 50-362**
Quality Assurance Program Description
San Onofre Nuclear Generating Station, Units 1, 2, and 3

Reference: January 13, 1998 letter from J. L. Rainsberry (SCE) to the
Document Control Desk (NRC), Subject: Quality Assurance
Program Description, San Onofre Nuclear Generating Station,
Units 1, 2, and 3

Gentlemen:

Enclosed for NRC review and approval is Change Notice 47 to the Southern California Edison (SCE) Quality Assurance Topical Report SCE 1-A Amendment 19 dated December 1997. Amendment 19 of the Topical Report was provided to the NRC by Reference 1. Change Notice 47 represents a reduction in the previously reviewed and approved commitments in Amendment 19. In accordance with 10 CFR 50.54(a)(3), NRC approval of the change is required prior to implementation.

Description of Change

Change Notice 47 is a request to require calibration failure notice evaluations only for safety related, permanent plant equipment. Calibration failure notice evaluations are currently required at the San Onofre Nuclear Generating Station (SONGS) on safety-related, non-safety related fire protection, and American Society of Mechanical Engineers (ASME) Section III non-safety related equipment. A calibration failure notice evaluation is performed on a piece of Measuring and Test Equipment (M&TE), upon calibration failure, to identify which equipment that piece of M&TE was used on. This

150021

9909150172 990913
PDR ADDCK 05000206
P PDR

P. O. Box 128
San Clemente, CA 92674-0128
949-368-1480
Fax 949-368-1490

//
2004

request does not change the SONGS practice of using calibrated test equipment on non-safety related components. This proposed change is only to delete the requirement for calibration failure notice evaluations on the non-safety related equipment described above.

Reason for Change

The SONGS 1997 and 1998 data for identification and evaluation of M&TE found to be out of tolerance or inoperative shows less than 0.1% component rework required. Similarly, no instances were identified in which component rework resulted in any impact on component operability. No instance was identified where, after a calibration failure and subsequent component rework, the subsequent measurements differed significantly from the previous measurements.

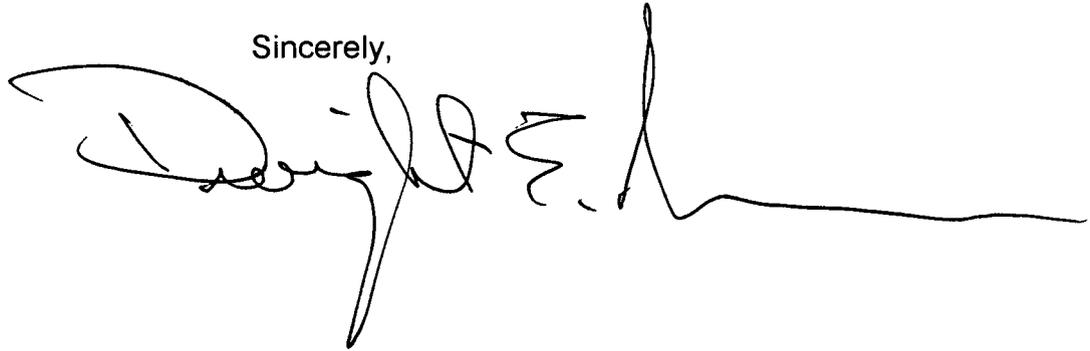
Basis for Concluding the Revised Program Satisfies 10 CFR 50 Appendix B and the Previously Accepted Quality Assurance Program Commitments

This change is consistent with IEEE Standard 498-1980, the applicable standard to which SONGS is committed for calibration and control of M&TE. The scope of this standard "sets forth the requirements for a calibration program to control and verify the accuracy of measuring and test equipment used to assure that important parts of nuclear power generating stations are in conformance with prescribed technical requirements and that data provided by testing, inspection or maintenance are valid." "Important parts" are further defined in this standard to include "structures, systems, and components whose satisfactory performance is required for the plant to operate safely, to prevent accidents that could cause undue risk to the health and safety of the public, or to mitigate the consequences of such accidents if they were to occur." The definition of "safety related" in the SONGS Topical Report closely matches this definition. Therefore, SCE believes that IEEE Standard 498-1980 applies only to safety related permanent plant equipment.

SCE considers this change to be a decrease in the commitments provided in the Topical Report Amendment 19 dated December 1997. This proposed change continues to require calibration failure notice evaluations to be performed on safety related, permanent plant equipment. Therefore, with this change the San Onofre Quality Assurance Program will continue to satisfy 10 CFR 50, Appendix B and the commitments previously accepted by the NRC.

If you have any questions or need additional information, please call me or Jack Rainsberry at (949) 368-7420.

Sincerely,

A handwritten signature in black ink, appearing to read "D. B. Spitzberg", followed by a long horizontal line extending to the right.

Enclosure

cc: E. W. Merschhoff, Regional Administrator, NRC Region IV
W. C. Huffman, NRC Project Manager, San Onofre Unit 1
L. Raghavan, NRC Project Manager, San Onofre Units 2 and 3
D. B. Spitzberg, Regional Project Inspector, San Onofre Unit 1
J. A. Sloan, NRC Senior Resident Inspector, SONGS Units 2 & 3

**SOUTHERN CALIFORNIA EDISON COMPANY
CHANGE TO TOPICAL REPORT SCE 1-A**

Affected Amendment: 19

Change Notice Number: 47

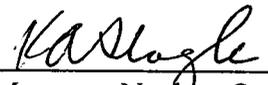
Affected Pages: 17.2-38 and table of contents

- I. Section 17.2.12, Calibration Program, program requirements section:**
- A. Current Requirements: When a calibration failure is noted on a piece of Measuring and Test Equipment (M&TE), the San Onofre Nuclear Generating Station (SONGS) present commitment is to identify where that piece of M&TE was used on safety related, non-safety related fire protection and American Society of Mechanical Engineers (ASME) section III non-safety related permanent plant equipment.
- B. Requested Change: Upon calibration failure, limit the identification of equipment that has been calibrated with M&TE to safety-related permanent plant equipment only. This request does not change our practice of using calibrated test equipment on non-safety related components. It is to change our commitment to identify only what safety related plant equipment was calibrated with M&TE upon notice of a calibration failure.
- C. Reason for Change: SONGS 1997 and 1998 data for identification and evaluation of M&TE found to be out of tolerance or inoperative shows less than 0.1% component rework required. Similarly, no instances were identified in which component rework resulted in any impact on component operability. No instances were identified where, after a calibration failure and subsequent component rework, the subsequent measurements differed significantly from the previous measurements.
- D. Basis for change: This change is consistent with IEEE standard 498-1980, the applicable standard to which SONGS is committed for calibration and control of Measuring and Test Equipment. The scope of this standard "sets forth the requirements for a calibration program to control and verify the accuracy of measuring and test equipment used to assure that important parts of nuclear power generating stations are in conformance with prescribed technical requirements and that data provided by testing, inspection or maintenance are valid." "Important parts" are further defined in this standard to include "structures, systems and components whose satisfactory performance is required for the plant to operate safely, to prevent accidents that could cause undue risk to the health and safety of the public, or to mitigate the consequences of such accidents if they were to occur." The definition of "safety related" in the SONGS Topical Report is as follows:

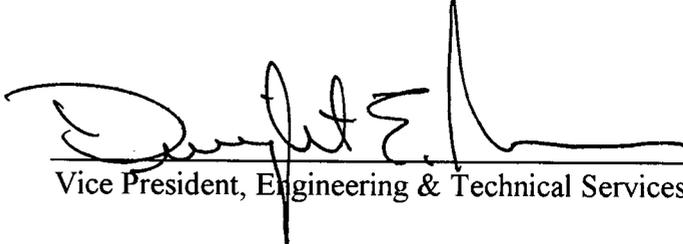
“Applies to the prevention or mitigation of the consequences of postulated accidents that could cause undue risk to the health and safety of the public.” Since this closely matches the scope of IEEE Standard 498-1980 as described in the introduction, SCE believes that 498-1980 is intended to apply to safety related permanent plant equipment only.

Because calibration failure notice evaluations will continue to be performed on safety related permanent plant equipment, 10CFR50, Appendix B will continue to be satisfied. However, because this request is to no longer perform calibration failure notices on non-safety related permanent plant equipment, this change is considered a reduction in commitment from the current SONGS program (Amendment 19, Change Notice 46) based on 10 CFR 50.54 (a)(3)(ii). Therefore, this change will be submitted to the NRC for approval prior to implementation

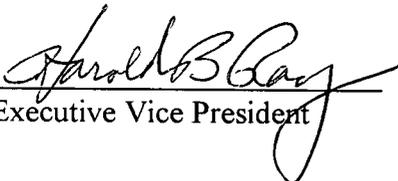
Approvals:



Manager, Nuclear Oversight



Vice President, Engineering & Technical Services



Executive Vice President

Date Submitted to NRC: September 13, 1999