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September 5, 1980



U. S. Nuclear Regulatory Commission Office of Inspection and Enforcement Region V 1990 North California Boulevard Suite 202, Walnut Creek Plaza Walnut Creek, California 94596

Attention: Mr. R. H. Engelken, Director

DOCKET NO. 50-206 SAN ONCERE - UNIT 1

Dear Sir:

IE BULLETIN 80-20 FAILURES OF WESTINGHOUSE TYPE W-2 SPRING RETURN TO NEUTRAL CONTROL SWITCHES

80-272

Reference is made to your correspondence of July 31, 1980 which forwarded the subject IE Bulletin. This bulletin identified potential deficiencies in Westinghouse Type W-2 spring return to neutral control switches.

The following is our response to each item in the Bulletin:

ITEM 1: Determine whether Westinghouse Type W-2 control switches with spring return to neutral position are used in safety-related applications at your facility. If so, identify the safety-related systems using these switches and the total number of switches so used. If no such switches are used in your facility, you should indicate that this is the case and ignore the remaining questions.

Response:

We have determined that a total of eleven (11) Westinghouse Type W-2 control switches with spring return to neutral are in use in safety-related applications. All eleven switches are in the safety injection system. Three control the three loop safety injection isolation valves (MOV's 850A, B and C). The remaining eight control the feedwater pump

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suction/discharge valves (HV-851A, B, HV-852A, B, HV-853A, B and HV-854A, B), but are installed in the circuit in such a fashion that failure of the neutral contacts would not prevent operation of the valves for their automatic safetyrelated function.

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ITEM 2:

Licensees of operating plants using Type W-2 spring return to neutral control switches in safety-related applications shall perform continuity tests on all such switches. These tests shall be performed with the switch operator in the neutral position and completed within ten (10) days of the date of this bulletin. In addition, this continuity test shall be repeated at least every thirty-one (31) days after the initial test and after each manipulation of the switch from its neutral position. These continuity tests may be discontinued subsequent to implementing the longer term corrective measures described below.

Response:

The plant has been in a cold shutdown condition since April, 1980. The safety injection system and the three switches in question are not required to be operable in cold shutdown. Consequently, failure of the switches under existing plant conditions would not result in disabling of a safety-related function.

Continuity of the neutral contacts for these three switches was verified on August 15, 1980. Since the switches are not required to be operable under the existing plant conditions, we intend to defer follow-up checks (31 days) pending return of the plant to a condition which would require that the safety injection system be operable. Prior to placing the plant in a condition which would require that the safety injection system be OPERABLE, the continuity of the neutral contacts will be verified and re-verified every 31 days thereafter whenever the safety injection system is required to be OPERABLE and until completion of any necessary long-term actions which may be inditified as discussed in our response to Item 3, below.

ITEM 3:

Licensees of operating plants and holders of construction permits shall describe the longer term corrective measures planned and the cate by which such measures will be implemented by actual installation or by design change, as appropriate. As a minimum, the longer term corrective measures should include rewiring the indicating light as shown in Figure 1 provided the light is readily visible to the control room operator. If not, failures of the neutral position contacts should be annunciated in the control room. U. S. Nuclear Regulatory Commission

Response:

The specific circuit design of the three switches in question does not allow the simple modification proposed in the Bulletin to be made. Further, we have been informed by Westinghouse that a preliminary design review has located no inherent defects in the Type W-2 switch neutral contacts and that they recard the failure at Zion to be random in nature and non-deneric. Consequently, we are deferring any long term corrective action pending completion of the Westinghouse design review which is currently scheduled to be completed by November 1, 1980. If the final results of the Westinghouse review indicate a potential deficiency, the subject switches shall be modified, rewired or replaced to preclude failures of the neutral contacts from preventing actuation of the safety-related components. We will inform you in writing of our planned corrective action, if any is necessary, and a schedule for same.

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In accordance with your request in the cover letter to the subject bulletin, we have estimated that 48 man-hours of work were required to complete the report required by the subject bulletin. No man-hours have yet been required for corrective action.

If you have any questions or require additional information concerning this response, please contact me.

Sincerely, .

Nor Haynes

J. G. Haynes Manager of Nuclear Operations

cc: Division of Reactor Operations Inspection c/o Distribution Services Branch Division of Document Control, Administration Washington, D.C. 20555