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June 2, 1982

Director, Office of Nuclear Reactor Regulation  
Attention: D. M. Crutchfield, Chief  
Operating Reactors Branch No. 5  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Gentlemen:

Subject: Docket 50-206  
Post-TMI Requirements  
San Onofre Nuclear Generating Station  
Unit 1

- References: 1. Letter, K. P. Baskin to D. M. Crutchfield,  
Automatic Initiation of the AFWS, February 2, 1982
2. Letter, R. W. Krieger to D. M. Crutchfield,  
Post-TMI Requirements, April 16, 1982

References 1 and 2 provided the NRC staff with information regarding our intentions to upgrade to safety-grade some components of the Auxiliary Feedwater System (AFWS) which were installed as controls grade equipment as part of the TMI requirements for automatic initiation of the AFWS. During a recent telephone discussion with members of your staff, it was requested that we provide an updated schedule for implementation of these modifications. It was also indicated that this information would be included in a Confirmatory Order to be issued by the Regulatory staff. The purpose of this letter is to supply the requested information.

Reference 2, Item II.E.1.2, indicated that the three identified safety-grade relays would be installed during the current outage. This completion schedule will be met. It was also indicated that the safety-grade replacements for the commercial grade ammeter and transducer were ordered and had not been received. The delivery date for the ammeter has been delayed due to problems identified by the supplier's (Westinghouse) Quality Assurance Department. The expected delivery date is unknown as of the writing of this letter pending resolution of the QA problem. Since the transducer performs its function in series with the ammeter, they will both be installed at the same time. If the ammeter is received by a date which supports the schedule for startup from the current outage, the two components will be installed prior to startup from the current outage. If it is received on a later date, the two components will be installed during the next outage of sufficient duration but no later than the next refueling outage.

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Reference 1 indicated that some mechanical equipment of the AFWS also would be replaced with safety-grade equipment. It was estimated at that time that the replacement could be completed prior to startup from the next refueling outage. The present status of our upgrade effort for these items is discussed below.

- 1) The relief valve on the steam supply to the turbine driven AFWS pump (RV-3206) was identified as requiring upgrade. Initially it was intended to purchase a qualified valve, however it was determined that a safety-grade valve of the size required was not available. It was decided to purchase a set of non-safety grade valves and qualify by testing. The test specifications are scheduled to be provided to the testing laboratory the week of June 7, 1982. The valves are scheduled to be received on or about July 3, 1982, with the qualification testing completed and the valve ready for installation after October 31, 1982. The installation of this valve would therefore be completed during the first outage of sufficient duration which occurs after October 31, 1982, but no later than the next refueling outage.
- 2) The positioner and air set for the AFWS flow control valves (FCV 2300, 2301, 3300, 3301) were identified as requiring upgrade. It is our intent to purchase qualified equipment, and based on preliminary discussions with suppliers, it is expected that if the equipment is available the delivery lead time is at least six months. This course of action has not been followed at the present time since questions have arisen with regard to the qualification of available equipment. It appears that the determination will be made that fully qualified equipment is not available and we will have to undertake a program to qualify non-safety grade equipment. With a target date of July 15, 1982 for initiating the program, it is expected that installation could be supported nine months later (three months delivery and six months testing). The installation of this equipment would therefore be completed during the first outage of sufficient duration which occurs after April 15, 1983, but no later than the next refueling outage.
- 3) The backup nitrogen supply for the flow control valves identified in 2 above was identified as requiring upgrade. The pressure regulator for this system has been identified as the component with the most impact on the schedule for implementation. We have been unable to locate suppliers of qualified pressure regulators. We will have to undertake a qualification program similar to that mentioned in 2 above, with a lead time of approximately nine months (three months for delivery and six months testing). The installation of this equipment would therefore be completed during the first outage of sufficient duration which occurs after April 15, 1983, but no later than the next refueling outage.

Mr. D. M. Crutchfield

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The schedules provided in 1, 2 and 3 above are based on our best effort to qualify the identified equipment. As in any program where the qualification results are dependent on equipment procurement and performance, there exists the possibility that these efforts may not be successful. If for any reason we are unable to meet the schedules provided in 1, 2 and 3 above, we will notify you at that time and provide any changes to our plans and/or schedules.

If you have any questions or desire additional information, please contact me.

Very truly yours,

*KP Bushaw*