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June 15, 1982

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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 No. 50-206
Seismic Design Considerations
San Onofre Nuclear Generating Station
Unit 1

This letter confirms telephone conversations with representatives of the Regulatory staff during the week of June 7, 1982 regarding our plans to accelerate improvements at San Onofre Unit 1 to further increase the earthquake resistance of the plant. As discussed below, we indicated that the present outage would be extended until late this fall, at which time we expect the modifications associated with our SEP seismic reevaluation program to be completed.

As you know, our SEP seismic reevaluation program was proceeding as planned to analyze and upgrade San Onofre Unit 1 to withstand a 0.67g ground motion. We have engaged in numerous discussions and meetings with the Regulatory staff regarding these analyses and results and the schedule for any modifications. Based on these discussions and meetings, an overall goal was established to complete the analyses and any modifications by January 1, 1983 unless otherwise justified on a case by case basis.

Following the submittal of a report in April 1982, the Regulatory staff expressed an interest in additional details on the original seismic basis of the plant which was completed in 1968. The analyses to provide the additional details could require a significant amount of time and resources, but not contribute to the overall goal of upgrading the plant to withstand a 0.67g ground motion. Accordingly, the most effective approach to meet the new seismic design requirements applied to San Onofre Unit 1 by the NRC is to move ahead immediately to complete the analyses and upgrade the plant to 0.67g. While we have confidence that the present plant will withstand the most severe earthquake the area could experience, we are accelerating the program to remove any questions regarding the plant design and to complete the upgrading which has been underway.

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Mr. D. M. Crutchfield

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We are preparing an implementation plan, including a scope of work and schedule for completion of the upgrading activities. The plan will also identify licensing milestones, including approvals requested from the Regulatory staff, to support the upgrading activities and resumption of power operation in late fall, 1982. We expect to submit the plan the week of June 21, 1982.

If you have any questions or desire additional information concerning our plans discussed above, please contact me.

Very truly yours,

KP Bush