

Southern California Edison Company



P. O. BOX 800
2244 WALNUT GROVE AVENUE
ROSEMEAD, CALIFORNIA 91770

K. P. BASKIN
MANAGER OF NUCLEAR ENGINEERING,
SAFETY, AND LICENSING

June 30, 1982

TELEPHONE
(213) 572-1401

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
Fire Protection Program Review
San Onofre Nuclear Generating Station
Unit 1

By letter dated May 10, 1982, you granted our request for an exemption from the schedule for submittal of information specified in 10 CFR 50.48(c). The exemption deferred to July 1, 1982 the schedule for submittal of plans and schedules to achieve compliance with the Fire Protection Safe Shutdown requirements of Section III.G.2 of Appendix R to 10 CFR 50. A similar exemption was granted for submittal of design descriptions for alternative or dedicated shutdown systems, if applicable, to comply with the requirements of Section III.G.3 of Appendix R. If alternative or dedicated shutdown systems are employed, the information requested in the NRC Generic Letter 81-12 as clarified in your May 10, 1982 letter is to be provided for these systems. This letter supplies these plans, schedules and design descriptions.

Enclosure 1 to this letter provides the results of our evaluation of the design of San Onofre Unit 1 regarding compliance with Section III.G.2 of Appendix R. Due to the original design of San Onofre Unit 1, a large number of areas were identified where the plant systems require modification. Compliance with Section III.G.3 was examined for those areas not in compliance with III.G.2. Existing equipment which could be used as alternative shutdown systems is very limited so that the use of this option would have resulted in plant changes very similar to those which would be required to comply with Section III.G.2, but the installation could be non-safety related with appropriate isolation devices. The installation of a dedicated shutdown system in accordance with Section III.G.3 would involve the addition of all of the pumps, valves, piping, power supply and controls equipment for one train

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of non-safety related shutdown equipment which would be used only for post-fire shutdown. This would also involve a large set of modifications similar to those required to comply with Section III.G.2, without the commensurate increase in safety provided by a set of safety related modifications. It was decided that the best approach for San Onofre Unit 1 would be to modify the plant to comply with Section III.G.2 of Appendix R, in order to provide a safety related system that will serve broad safety goals. Accordingly, extensive plant system changes as identified in Enclosure 1 to this letter are proposed for installation at San Onofre Unit 1.

As a result of recent discussions with representatives of the Regulatory staff during the week of June 14, 1982, we have been informed that they consider use of the Remote Shutdown Panel (RSP), even assuming that the RSP is safety related and part of the normal shutdown systems, as an alternative shutdown system. As described in Enclosure 1 to this letter, we are using the RSP to achieve safe shutdown following a fire in the control room. Accordingly, the information requested in the NRC Generic Letter 81-12 as clarified by your letter of May 10, 1982, related to the Remote Shutdown Panel is provided in Enclosure 2 to this letter. Additionally, Enclosure 2 to this letter as supplemented by Enclosure 3 to this letter also provides our evaluation of high-low pressure interfaces as required in the NRC Generic Letter 81-12.

Enclosure 1 to this letter lists two sets of system configuration changes defined in separate categories. These two identified categories represent the intrinsic nature of the changes and are labeled Modifications and Additions. The Modifications involve installation of fire barriers, reconnection of equipment to a different but existing power supply and minor equipment relocation. The Additions involve substantial additional new equipment or systems and new equipment to accommodate substantial component relocation activities. As demonstrated in Enclosure 1 to this letter, since the plant changes all involve existing safety systems, both Modification and Addition changes require a plant outage for installation.

As discussed above, our evaluation has determined that: (1) the best means of compliance with Appendix R is to modify existing systems to meet the requirements of Section III.G.2, and (2) the Regulatory staff has defined one alternate shutdown system; namely, the RSP. Under the original schedule contained in 10 CFR 50.48(c) all Modifications and Additions, except for those involving the RSP, were to have been implemented during the first outage meeting certain requirements beginning at least 150 days after plans and schedules were filed. However, since the May, 1982 exemption addressed only the deadline for filing plans and schedules, and did not provide a corresponding deferral in the implementation schedule, 10 CFR 50.48(c) would require that these modifications be implemented during the current outage, without the time for implementation initially contemplated by NRC. The Additions involving the RSP are required to be installed at the first planned or unplanned outage of 60 days or 120 days respectively, or the first refueling outage, which occurs 180 days after NRC approval of design details. This would result in installation of the RSP Additions by no later than the

next refueling outage. Implementation of the Modifications and Additions on the existing 10 CFR 50.48(c) schedules is not practical because of the nature and extent of the proposed modifications and because the conceptual engineering has only now been completed as provided in the exemption dated May 10, 1982. A detailed evaluation of engineering, procurement and installation requirements for the Modifications and Additions has determined that the following implementation schedules can be met:

1. The Modifications can be completed prior to startup from the next refueling outage which is currently expected in late 1983,
2. The Additions can be completed prior to startup from the second refueling outage from the date of this letter which is currently expected in mid 1985.

Since these schedules are similar to those applicable to utilities proposing alternative and dedicated shutdown systems of a scope similar to that faced at San Onofre Unit 1 in complying with Section III.G.2, and because the NRC granted an exemption to July 1, 1982 for submittal of plans, schedules and design descriptions, it is appropriate that an extension of the existing implementation schedules should be granted to those schedules identified above.

In addition, installation of Modifications and Additions in accordance with either of the two sets of schedules for implementation discussed above would result in a very large set of plant system configuration changes that could be affected by or conflict with those expected to be identified as part of the SEP Integrated Assessment, as was explained in our exemption request of March 17, 1981 as supplemented on November 9, 1981. Implementation of these changes independent of SEP can result in wasted effort since SEP may determine that additional modifications to a system are necessary to comply with another specific NRC concern. In developing the proposed Modifications and Additions we have endeavored to minimize the risk of wasteful system changes by incorporating, where possible, the changes which can now be predicted to be forthcoming from SEP and other NRC review programs. The fact remains that this risk can not be eliminated unless the resolution of concerns is integrated into a common effort which is the purpose of SEP Integrated Assessment. Integration of the effort will result in the optimum design and maximum safety benefits.

Accordingly, we request NRC action regarding compliance with 10 CFR 50.48(c) as follows:

1. An exemption from the schedular implementation requirements of 10 CFR 50.48(c)(3) is hereby requested for the Modifications and Additions identified in Enclosure 1 and 2 to this letter, with the exception of the RSP Additions, to be implemented as part of any modifications identified during SEP Integrated Assessment, no earlier than the schedule indicated on page 2 above.

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2. An exemption from the schedular implementation requirements of 10 CFR 50.48(c)(4) is hereby requested for the RSP Additions identified in Enclosure 1 to this letter, to be implemented as part of any modifications identified during SEP Integrated Assessment, no earlier than the schedule indicated on page 2 above.
3. Commission reconsideration of its May, 1982 exemption decision is hereby requested with respect to the submittal of plans, schedules, and design descriptions in accordance with 10 CFR 50.48(c)(5) as originally requested by our submittals of March 19, 1981 and November 9, 1981, to allow subsequent modification of the attached plans to conform with SEP as it develops. Reconsideration is warranted based on the likelihood that new information derived from SEP Integrated Assessment may result in the identification of other plant configuration changes.

Fully documented formal submittals for these three requests will be provided as soon as practicable but no later than July 31, 1982.

It should also be noted that in spite of the above mentioned exemption requests, it is our intent to commence the efforts necessary to comply with the existing requirements on the schedules previously identified above on page 2 as those which can be met. In order to avoid costly and wasteful effort, however, we have requested these exemptions and our formal exemption submittals will provide what we believe is sufficient basis to justify the schedular extensions. In order to resolve any concerns which may result from review of Enclosure 1 to this letter, we are presently available to meet with the Regulatory Staff.

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

Very truly yours,

RW Krueger for KP Baskin

Enclosures