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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
NRC Guidelines for Seismic Evaluation Criteria
San Onofre Nuclear Generating Station
Unit 1

By letter dated July 26, 1982, the NRC forwarded to us a copy of a document entitled "Reevaluation Guideline Seismic Criteria for SEP Group II Plants." These guidelines were discussed in a meeting with the NRC on July 28 to 30, 1982. The purpose of this letter is to confirm our intentions regarding two aspects of the guidelines as discussed in telephone conversations with the NRC.

The acceptance criteria for piping on page 4 of the guidelines reference Equations 10 and 11 of ASME Section III, paragraph NC-3653.2. These equations pertain to consideration of seismic anchor displacements due to an Operating Basis Earthquake (OBE). Analysis of the OBE is not now nor has it ever been part of the SEP seismic reevaluation program. Seismic anchor displacements due to an OBE will not be evaluated for piping as part of the San Onofre Unit 1 seismic reevaluation program and as such Equations 10 and 11 of NC-3653.2 will not be evaluated. Seismic anchor movements due to a DBE will be addressed for piping supports in accordance with the guidelines.

The acceptance criteria for mechanical equipment on page 7 of the guidelines indicate that mechanical equipment internals should be evaluated. This concern relates to the evaluation of the operability of the mechanical equipment. Operability considerations are part of generic NRC seismic activities and are not part of the SEP seismic reevaluation program. Therefore, evaluation of mechanical equipment internals will not be evaluated as part of the San Onofre Unit 1 seismic reevaluation program.

If you have any questions on this information, please let me know as soon as possible.

Very truly yours,

K. P. Baskin

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