

Southern California Edison Company



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November 22, 1982

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

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
Fire Protection Program Review
San Onofre Nuclear Generating Station
Unit 1

- References: (1) Letter from K. P. Baskin to
D. M. Crutchfield, same subject,
dated June 30, 1982
- (2) Supplemental Requests for Exemption and
Petition for Reconsideration, submitted
August 3, 1982

Reference (1) provided our submittal of plans, schedules and design description of safe shutdown modifications required by 10 CFR 50.48(c) as specified in your letter of May 10, 1982. Reference (1) included a request for reconsideration of our previous request for exemption from the schedules associated with modifications required by 10 CFR 50.48(c). Reference (2) supplemented the reconsideration request and expanded on the basis for the exemption.

As a result of telephone discussions with members of the Regulatory staff subsequent to the submittal of References (1) and (2), we were requested to review the safe shutdown modifications to determine if any could be implemented independent of the Systematic Evaluation Program (SEP) without incurring a large risk of additional retrofit and to provide a schedule, in lieu of SEP deferral, which would allow for installation of these modifications and minimize the risk of additional retrofit. The purpose of this letter is to provide the requested information.

A review of all "Modifications" and "Additions" conceptually identified in Reference (1) has concluded that no modifications can be made without incurring the risk of additional retrofit since all modifications can be considerably impacted by SEP as described in Section I of Reference (2).

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It should be noted, however, that most of the modifications identified in Section 8.6.2.4, "Instrument Air System" are currently being installed as part of the expedited seismic upgrade of San Onofre Unit 1 at some risk of additional retrofit following the integrated assessment of potential modifications identified as part of the SEP. This is an example of the manner in which the modification requirements which result from these two separate NRC review programs are interrelated.

In order to install the remainder of the safe shutdown modifications while minimizing the risk of additional retrofit, we plan to complete all modifications prior to startup from the refueling outage for Cycle 11 operation (i.e., the third refueling outage from the date of this letter) which is expected to commence in the 1988-1989 time frame. Notwithstanding this completion schedule, we intend to proceed with installation of modifications during refueling outages for Cycles 9 and 10, as practicable.

The extent of the modifications to be completed during the refueling outages for Cycles 9 and 10 depends on other modifications (i.e., SEP, Environmental Qualification, etc.) which may be required at that time. We will be closely interfacing with the Regulatory staff to establish the required modifications and appropriate integrated outage schedules as more information becomes available.

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

Very truly yours,

W P Basten