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January 18, 1983

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Director 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
Environmental Qualification of Safety-Related
Electrical Equipment
San Onofre Nuclear Generating Station
Unit 1

By letter dated November 30, 1982, you transmitted to us the Safety Evaluation Report for the Environmental Qualification of Safety-Related Electrical Equipment at San Onofre Unit 1. The Safety Evaluation Report also included the Technical Evaluation Report dated June 28, 1982 prepared by Franklin Research Center. Your letter requested that we provide justification for continued operation for items in your categories I.B, II.A and II.B for which justification was not previously provided.

We provided you with a justification for continued operation in our letter to you dated February 24, 1982. Your letter of March 8, 1982 indicated that the justifications provided were adequate for interim safe operation. Our review of the items in the NRC categories I.B, II.A and II.B and our February 24, 1982 submittal indicates that we did not provide justification for two items. The items are FT2002A, B and C, auxiliary feedwater flow indication, and R-1232, containment radiation monitor. Our February 24, 1982 letter indicated that these items were being replaced as part of TMI modifications.

By letter dated July 2, 1982 we provided a listing of the equipment installed as part of TMI modifications including their qualification documents. The aforementioned two items are identified in the letter as Item Nos. 20 and 25, respectively. The flow transmitters and radiation monitors have been installed and their qualification documents provided to Franklin Research Center. The basis for continued operation for each of these items is discussed below:

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1. Auxiliary Feedwater Flow transmitters: The qualification reports provided by the July 2, 1982 letter documented the separate effects testing of a similar transmitter, the Foxboro E10 series. The Foxboro NE10 series transmitters, which have been installed in the Auxiliary Feedwater System, have recently completed a test program in accordance with IEEE 323-74. The qualification documentation for this testing will be available in the first quarter of 1983. It is our understanding that the report will indicate these transmitters are qualified. Based on the testing of the similar E10 transmitter and the recent testing of the NE10 we conclude that these transmitters are qualified for San Onofre Unit 1.
2. Radiation Monitors: The qualification reports provided by the July 2, 1982 letter documented testing of the radiation monitors in accordance with IEEE 323-74. Based on the report we conclude that the monitors are qualified for San Onofre Unit 1.

Based on our review we still feel the justification for continued operation provided in the February 24, 1982 letter for the remaining items are still applicable. If you have any questions regarding this matter, please let me know.

Very truly yours,

RW Krueger for KP Baskin