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April 6, 1983

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: Systematic Evaluation Program
Topic VI-10.A (Testing of Reactor Trip System and Engineered Safety Features)
San Onofre Nuclear Generating Station
Unit 1

Reference: February 28, 1983 letter R. W. Krieger (SCE) to D. M. Crutchfield (NRC), same subject

The referenced letter provided comments regarding your draft safety evaluation of the subject topic. In response to this letter, you requested additional information to continue your review of the subject topic. The additional information you requested includes copies of all procedures referenced in Enclosure 2 of the referenced letter. In compliance with your request, all referenced procedures have been compiled and forwarded to W. A. Paulson/E. McKenna by memorandum dated March 22, 1983.

Upon re-review of these procedures it was ascertained that a procedure had been erroneous referenced. In order to correct this error and provide clarification, Section III.B of Enclosure 2 of the referenced letter has been rewitten and is provided as an enclosure to this letter. Additionally, operating instruction procedures and engineering procedures which provide further information in regards to testing of the systems covered under Section III.B are also included.

If you have any questions regarding the enclosed or desire additional information, please let me know.

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Very truly yours,

R W Krieger

R. W. Krieger
Supervising Engineer
San Onofre Unit 1 Licensing

Enclosure

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Enclosure 2, Section II.B of February 28, 1983 SCE to NRC letter regarding SEP Topic VI-10.A should be re-written to read as follows: (Change bars are used to indicate modifications from above referenced letter).

III. B. "The San Onofre Unit 1 technical specifications do not agree with the present Standard Technical Specifications further in that:"

1. The Component Cooling Water System is not Under Surveillance

Response:

a. Valve Position - The valve positions on all safety related systems are checked on a monthly basis under Surveillance Instruction SO1-12.3-6 (Safety Related Systems Valve Alignment).

b. Valve Operability - In order to conduct the Component Cooling Water Inservice Pump Test (SO1-V-2.14.2) the associated valves of this system are required to be operable. Credit for the operability of these valves may be taken here or by the Inservice Testing of Valves Procedure (SO1-V-2.15). Operating Instruction SO1-12.4-2 (Quarterly Inservice Valve Testing) implements requirements established by Engineering Procedure SO1-V-2.15.

c. Pump Operability - The pump operability is verified on a monthly basis by the Component Cooling Water Inservice Pump Test (S01-V-2.14.2).

2. The Saltwater Cooling System is not Under Surveillance

Response:

a. Valve Position - See response to Item a above.

b. Valve Operability - In order to conduct the Salt Water Cooling Inservice Pump Test (S01-V-2.14.8), the associated valves of the salt water cooling system are required to be operable. In addition, the power operated valves of this system are full stroke tested in accordance with the Inservice Testing of Valves Procedure (S01-V-2.15) at 3 month intervals. Operating Instruction S01-12.4-2 (Quarterly Inservice Valve Testing) implements requirements established by Engineering Procedure S01-V-2.15.

c. Pump Operability - The pump operability is verified on a monthly basis by the Salt Water Cooling Inservice Pump Test (S01-V-2.14.8).

3. The Ultimate Heat Sink is not Under Surveillance

Response:

The Salt Water Cooling System is the ultimate heat sink for the San Onofre Unit 1. The response to B.2 above describes the surveillance of this system. In addition, the saltwater cooling system utilizes the Pacific Ocean as its resource and it is not considered practical to establish surveillance requirements for the Pacific Ocean.

The surveillance and testing intervals specified in this section are consistent with those specified in the Standard Technical Specifications.

MJT:7599