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April 8, 1983

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Director, Office of Nuclear Reactor Regulation
Attention: Mr. D. G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

Subject: Docket No. 50-206
TMI Action Item II.K.3.5, "Automatic
Trip of Reactor Coolant Pumps"
San Onofre Nuclear Generating Station
Unit 1

- References:
1. Letter, D. G. Eisenhut, NRC, to All Licensees with Westinghouse (W) Designed Nuclear Steam supply Systems (NSSS), Resolution of TMI Action Item II.K.3.5, "Automatic Trip of Reactor Coolant Pumps" (Generic Letter No. 83-10d), February 8, 1983
 2. Letter, D. M. Crutchfield, NRC, to R. Dietch, SCE, IE Bulletin 79-06C, Item 1, Automatic Trip of Reactor Coolant Pumps, June 9, 1981

Reference 1 forwarded the results of the NRC staff evaluation of the subject TMI Action Plan Item. The evaluation concluded that the need for reactor coolant pump (RCP) trip, following a transient or accident, should be determined by each licensee on a case-by-case basis, considering the Owners Group input. We were requested to provide our plans and schedule for resolution of this issue within 60 days following the receipt of Reference 1, or if additional time is required, we were requested to indicate, within 30 days, when this information will be submitted.

Following our review of Reference 1, we contacted Westinghouse Electric Corporation, the NSSS supplier for San Onofre Unit 1, to initiate the work necessary to fully respond to this Action Plan Item. Our discussions with Westinghouse confirmed that the Westinghouse Owners Group (WOG) has initiated efforts to evaluate this subject on a generic basis. However, as you may be aware, past WOG generic work has not been totally applicable to San Onofre Unit 1. Accordingly, we are working, in conjunction with Westinghouse and the WOG, to (1) determine to what extent the WOG generic basis will apply to San Onofre Unit 1, and (2) develop, if necessary, the plant specific approach required to resolve this issue relative to San Onofre Unit 1. Since this information is dependent upon completion of the WOG generic work, a

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definitive schedule for completing items 1 and 2 above cannot be provided at this time. However, it is expected that we can provide you with this information within 30 days following completion of the WOG generic work. We understand that information regarding the WOG schedule will be available approximately May 1, 1983 and, at that time we will advise you of a more definitive schedule for completing items 1 and 2 above.

Reference 1 also indicated that for plants with low head safety injection (SI) pumps you understand that reactor coolant pump (RCP) trip is still expected to occur on the low pressure trip setpoints presently proposed by Westinghouse for the design basis steam generator tube rupture. You indicated that this condition was considered unacceptable and that licensees affected should identify a more discriminating criterion for RCP trip that would allow continued RCP operation for tube leaks up to the design basis steam generator tube rupture. As documented in Reference 2 the use of automatic RCP trip on the SI signal (i.e., low pressurizer pressure) was judged acceptable in satisfying the requirements of IE Bulletin 79-06C, but that the ultimate resolution of NUREG-0737, Item II.K.3.5, may result in changes in the staff position on how to handle this issue. Accordingly, our plant specific approach for resolution of automatic RCP trip discussed above will address the need to identify a more discriminating criterion for RCP trip in the case of steam generator tube ruptures.

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

Very truly yours,

RWKrieger for KPBeskin