

Southern California Edison Company



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April 21, 1983

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
Supplement 1 to NUREG-0737
Requirements for Emergency Response Capability
San Onofre Nuclear Generating Station
Unit 1

- References:
1. Letter, D. G. Eisenhut, NRC, to All Licensees of Operating Reactors, Supplement 1 to NUREG-0737 - Requirements for Emergency Response Capability (Generic Letter No. 82-33), December 17, 1982
 2. Letter, K. P. Baskin, SCE to D. G. Eisenhut, NRC, Requirements for Emergency Response Capability and Inadequate Core Cooling Instrumentation System, February 10, 1983

Reference 1 provided us with Supplement 1 to NUREG-0737 to which we responded with Reference 2. Discussions with members of your staff have indicated a desire to be informed of the current level of compliance with Supplement 1 at San Onofre Unit 1. Responsive to that desire we have prepared the enclosed document "Current Status of Emergency Response Capability Implementation, San Onofre Nuclear Generating Station, Unit 1, April 15, 1983." This should provide an adequate assessment of the current situation at San Onofre Unit 1. For those items for which no action has yet been initiated we will not begin work until resolution of the startup issue as described in Reference 2.

*Acc'd
Add: W. Paulson*

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If you have any questions or desire additional information regarding the implementation status of the Supplement 1 initiatives at San Onofre Unit 1, please let me know.

Subscribed on this 21st day of April, 1983.

Respectfully submitted,

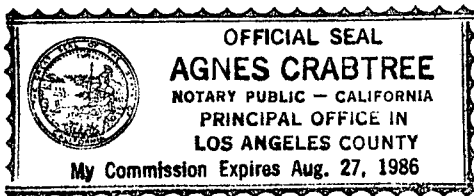
SOUTHERN CALIFORNIA EDISON COMPANY

By: RW Krieger
R. W. Krieger
Supervising Engineer
San Onofre Unit 1 Licensing

Subscribed and sworn to before me this 21st day of April, 1983.

Agnes Crabtree
Notary Public in and for the County of
Los Angeles, State of California

My Commission Expires: Aug 27, 1986



CURRENT STATUS OF EMERGENCY
RESPONSE CAPABILITY IMPLEMENTATION

SAN ONOFRE NUCLEAR GENERATING STATION
UNIT 1

APRIL 15, 1983

INTRODUCTION

The NRC provided Supplement 1 to NUREG-0737 as an attachment to a letter from D. G. Eisenhut to All Licensees of Operating Reactors, dated December 17, 1982. Supplement 1 defined the requirements for emergency response capability that, when implemented, would provide a consistent level of capability among all licensees. The NUREG's and Regulatory Guides that Supplement 1 references are intended to be utilized as "guidance" in meeting the initiatives of Supplement 1.

It is the purpose of this status report to provide a complete assessment of the current implementation level of the Supplement 1 initiatives at San Onofre Unit 1. The report is organized to correspond to the categories of Supplement 1 and a list of the references is provided as an Appendix.

CURRENT STATUS OF SUPPLEMENT 1
TO NUREG-0737 AT SAN ONOFRE UNIT 1

1. Safety Parameter Display System (SPDS) - Our letter of October 17, 1979 (Reference 1) contained our response to NUREG-0578 item 2.2.2.b, Onsite Technical Support Center, in which we stated that we would install a Technical Data Display and Transmit System in the Technical Support Center (TSC). Our letter of July 1, 1981 (Reference 2) provided the NRC with the design description of the above mentioned system and indicated that it contains the capability to transmit the data, via modems, to the offsite Emergency Operations Facility (EOF). This data display and transmission system, currently installed, is not an SPDS and currently there are no plans to initiate any work on the SPDS initiative per Supplement 1 until resolution of the startup issue as described in Reference 3.
2. Detailed Control Room Design Review - This requirement was initially set forth in NUREG-0737 as Item I.D.1. However, the NRC deferred implementation until NUREG-0700, "Guidelines for Control Room Design Reviews" could be finalized. NUREG-0700 was published in September 1981. Despite the issuance of NUREG-0700, the NRC had not yet taken action to require licensees to perform a control room design review until the issuance of Supplement 1. There are no plans to perform a control room design review for San Onofre Unit 1 until resolution of the startup issue as described in Reference 3.
3. Regulatory Guide 1.97 (Revision 2) - This Regulatory Guide was issued in December, 1980 and has been implemented at San Onofre Unit 1 only where appropriate as a design criteria in response to NUREG-0737 requirements. The balance of the accident monitoring capabilities described in Regulatory Guide 1.97 have not been committed for San Onofre Unit 1.

Prior to the issuance of Supplement 1, we initiated a survey of our compliance to Regulatory Guide 1.97. This survey is under contract to Westinghouse and the current completion schedule for the survey is July 1, 1983. No further action on Regulatory Guide 1.97 will be considered until resolution of the startup issue as described in Reference 3.

4. Upgrade Emergency Operating Procedures (EOP's) - This requirement was initiated by NUREG-0737, Item I.C.1. Our previous position, as defined in our letter of August 6, 1981 (Reference 4), has been that the Westinghouse Owners Group had addressed this item adequately. In response to an NRC request for upgrades to particular EOP's for San Onofre Unit 1, we provided, by letter dated September 13, 1982 (Reference 5), the final versions of the requested procedures.

Since that date we have initiated the long-term procedure upgrade effort, scheduled to be completed in June, 1983. During a meeting in Bethesda, Maryland, on October 7, 1982, we informed the NRC of our final implementation schedule for the completion of the training and implementation for the EOP upgrade effort. This schedule was updated to the Fall, 1983 by letter dated February 16, 1983 (Reference 6).

The required procedures generation package had been planned to be submitted by April 1, 1983, but final review constraints have pushed the schedule to July 1, 1983.

5. Emergency Response Facilities - The Emergency Response Facilities consist of the TSC, OSC, and EOF as detailed below:

- a. Technical Support Center (TSC) - The requirements for the TSC were initiated by item 2.2.2.b of NUREG-0578, and later revised in NUREG-0737 and NUREG-0696. We committed to the implementation of an onsite technical support center in our letter of October 17, 1979 (Reference 1). We updated this commitment in our letter of January 17, 1980 (Reference 6), which provided the NRC with details of what technical data would be available in the TSC via the technical data display system. We informed the NRC in our letter of July 1, 1981 (Reference 2) that the TSC would be completed by October 1, 1982.

The TSC, as a facility, meets the requirements of Supplement 1 with the exception of the HVAC system which is to be upgraded on the schedule in your Order Confirming Commitments dated March 14, 1983. The technical data display and acquisition capability, as installed, meets the commitments in Reference 2, but it does not meet the guidance in NUREG-0696. Currently there are no plans to upgrade this system as previously discussed in item 1.

- b. Operational Support Center (OSC) - The requirements for the OSC were initiated by item 2.2.2.c of NUREG-0578 and later revised in NUREG-0737 and NUREG-0696. We committed to implementing an OSC in our letter of October 17, 1979 (Reference 1) and informed the NRC that our OSC was operational in our letter of July 1, 1981 (Reference 2). The OSC meets the criteria of Supplement 1.
- c. Emergency Operations Facility (EOF) - The requirements for the EOF were initiated by NUREG-0660 and later revised by NRC letter dated February 18, 1981 (Reference 8). The functional criteria for the EOF is contained in NUREG-0696. We informed the NRC in our letter dated July 1, 1981 (Reference 2), of our conceptual design and scheduled implementation date of October 1, 1982. The EOF, as a facility, meets the criteria of Supplement 1, with the exception of the distance to the backup EOF previously discussed in Reference 9. The technical data display and acquisition capability, as installed, meets what was committed to in Reference 2, but it does not meet the guidance in NUREG-0696. Currently there are no plans to consider upgrade to this system as previously discussed in item 1.

APPENDIX

REFERENCES

1. Letter, J. H. Drake, SCE, to D. G. Eisenhut, NRC, Responses to NRC Requirements Related to the Three Mile Island Accident, October 17, 1979
2. Letter, K. P. Baskin, SCE, to D. G. Eisenhut, NRC, San Onofre Nuclear Generating Station, Units 1, 2, and 3, July 1, 1981
3. Letter, K. P. Baskin, SCE, to D. G. Eisenhut, NRC, Requirements for Emergency Response Capability and Inadequate Core Cooling Instrumentation System, February 10, 1983
4. Letter, K. P. Baskin, SCE, to D. M. Crutchfield, NRC, Response to Order Confirming Commitments for TMI Related Requirements, August 6, 1981
5. Letter, K. P. Baskin, SCE, to D. M. Crutchfield, NRC, San Onofre Nuclear Generating Station, Unit 1, September 13, 1982
6. Letter, K. P. Baskin, SCE, to D. M. Crutchfield, NRC, Post-TMI Requirements, February 16, 1983
7. Letter, K. P. Baskin, SCE, to D. G. Eisenhut, NRC, Additional Information in Support of Responses to NRC TMI Requirements, January 17, 1980.
8. Letter, D. G. Eisenhut, NRC, to All Licensees of Operating Plants, Post-TMI Requirements for the Emergency Operations Facility (Generic Letter 81-10), February 18, 1981.
9. Letter, K. P. Baskin, SCE, to D. M. Crutchfield, NRC, Emergency Response Facilities, December 7, 1982