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June 8, 1981

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 No. 50-206  
Flooding from Non-Safety Related Piping and Equipment  
San Onofre Nuclear Generating Station  
Unit 1

- References:
1. Letter, D. M. Crutchfield, NRC, to Robert Dietch, SCE, Multi-Plant Issue B-11 and Partial Review of SEP Topics III.5.b and VI.7.d, March 18, 1981
  2. Letter, K. P. Baskin, SCE, to D. M. Crutchfield, NRC, Effects of Non-Category A Equipment Failure, August 29, 1980
  3. Letter, K. P. Baskin, SCE, to D. M. Crutchfield, NRC, Flooding from Non-Safety Related Piping and Equipment, October 15, 1980
  4. Letter, K. P. Baskin, SCE, to D. M. Crutchfield, NRC, SEP Topic III-6, Seismic Design Considerations, April 24, 1981

Your letter of March 18, 1981 (Reference 1) transmitted to us your Technical Evaluation Report (TER) concerning the susceptibility of safety related systems to flooding from failure of non-Category A systems for San Onofre Unit 1. The purpose of this letter is to provide updated information with respect to our plans to implement two plant modifications reflected in the TER: circulating water line expansion bellows sleeves and any seismic upgrading of the Condensate Storage Tank (CST).

The TER approved our proposed plant modifications to mitigate the consequences of a postulated failure of the circulating water line expansion bellows. Reference 2 committed to install by June 1, 1981, flow restricting sleeves around each bellows. (The sleeve design was submitted by Reference 3.) However, as discussed with your staff, the sleeves will not be installed until July 1, 1981 for the following reasons:

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1. Each bellows has a distinct difference pertaining to the retaining glands and mounting flanges.
2. The guides for the retaining straps were not welded in the shop, necessitating additional field welding.
3. Clips which were to be attached to the retaining straps were not welded on at the fabricators so additional field welding is necessary.
4. The original date was based upon NRC approval of the design about January 1, 1981. However, the TER was not issued until March 18, 1981.

With regard to the seismic reevaluation of the CST, our letter of August 29, 1980 indicated this would be completed by June 1, 1981. This was based on the assumption that this tank would be included in the reevaluation of structures, the schedule for which was provided by our letter of April 24, 1981 (Reference 4). However, as has been discussed with your staff, the CST is not being reevaluated as part of the structures reevaluation program, but is included in the reevaluation of mechanical piping and equipment. It is now expected that the CST will be reevaluated by approximately March, 1982. Any modifications to the tank which may be required will be implemented after the Systematic Evaluation Program integrated assessment which is currently scheduled for April 30, 1982. In the meantime, as described on page 10 of the TER, the door between the CST and the +20' level of the turbine building has been replaced with a metal door with no windows or air ventilation. This door will be locked closed during power operation.

If you have any questions or comments, please let me know.

Very truly yours,

