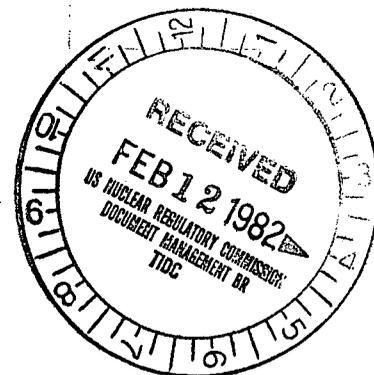


June 30, 1981

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



Subject: Docket No. 50-206
SEP Topic XV-9
San Onofre Nuclear Generating Station
Unit 1

Your letter of May 11, 1981 forwarded the draft evaluation of SEP Topic XV-9, Startup of an Inactive Loop or Recirculation Loop at an Incorrect Temperature, and Flow Controller Malfunction Causing an Increase in BWR Core Flow Rate. That letter requested that we inform you if our as-built facility differs from the licensing basis assumed in the assessment. The results of our review of the facts defining San Onofre Unit 1, as well as additional comments on your assessment, are provided as an enclosure to this letter.

If you have any questions regarding the enclosed, please contact me.

Very truly yours,

W. C. Moody

W. C. Moody
Manager, Nuclear Licensing

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SCE COMMENTS ON TOPIC EVALUATION XV-9
STARTUP OF AN INACTIVE LOOP

1. The third paragraph of this evaluation notes that in accordance with the San Onofre Unit 1 Technical Specifications, the power level for operation with a loop out of service is limited to 10%. For completeness, this paragraph should also note that operation with one or two reactor coolant pumps operating (at power levels less than 10%) is limited to less than 24 hours. See Technical Specification 3.1.2.E.
2. The analyses in this topic evaluation and in the San Onofre Unit 1 FSAR are based on an initial power level of 65%. However, as observed in Item 1 above, operation is limited to less than 10% with all three pumps not operating. Therefore, the analyses have an added degree of conservatism. This should be noted in the topic evaluation.
3. The first sentence of the last paragraph on page 2 of the topic evaluation should be clarified to read as follows: "The peak nuclear power of approximately 185% based on Figure 1 is reached in about eight seconds." This is consistent with Figure 1 of the topic evaluation and Figure 7.17 of the San Onofre Unit 1 FSAR.