

Southern California Edison Company



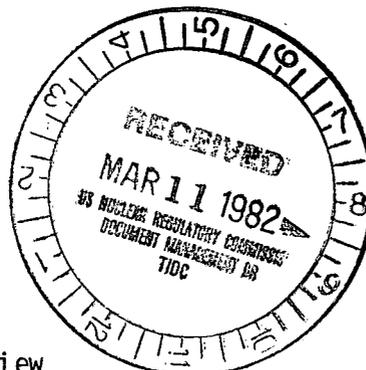
P. O. BOX 800  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CALIFORNIA 91770

March 10, 1982

TELEPHONE  
(213) 572-1401

K. P. BASKIN  
MANAGER OF NUCLEAR ENGINEERING,  
SAFETY, AND LICENSING

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 50-206  
Auxiliary Feedwater System (AFWS) Review  
San Onofre Nuclear Generating Station  
Unit 1

As a result of the meeting held with members of the NRC staff on January 19, 1982, several open issues regarding the subject review were identified. The purpose of this letter is to provide the information required to resolve the open issues.

The first area of concern involves the need to revise portions of Proposed Change No. 102, submitted as Amendment No. 97 by letter dated May 7, 1981, to reinstate several requirements of Proposed Change No. 87, submitted as Amendment No. 88 by letter dated February 8, 1980. These requirements resolve TMI Short Term Recommendations 1(GS-2), 4(GS-6) and 6 as identified in the Draft Safety Evaluation Report provided to us by letter dated December 7, 1981. The requirements were removed in Proposed Change No. 102 because the model technical specifications provided to us by letter dated July 2, 1980 did not include these requirements. During the meeting of January 19, 1982, we were notified that these requirements were still applicable and should be reinstated into the technical specifications. Accordingly, we have revised the applicable portions of Proposed Change No. 87 to reinstate these requirements. In addition, we have incorporated several changes suggested by the NRC staff during the January 19, 1982 meeting and also the changes to the basis which were previously submitted to the NRC as Enclosure 2 of the letter dated November 18, 1981. For convenience, the revised Technical Specification 4.1.9 is provided as Enclosure 1 with the changes identified by a bar in the margin. It should be noted that the technical specification requirements under discussion are still not incorporated into the standard technical specifications.

A001  
S  
1/1

8203120333 820310  
PDR ADDCK 05000206  
PDR

March 10, 1982

The second area of concern involves TMI Long Term Recommendations 2(GL-2), 4(GL-4) and 5(b) of the Draft Safety Evaluation Report. As reiterated during the meeting of January 19, 1982, it has been requested that the implementation of modifications to resolve these concerns be deferred until after completion of the Systematic Evaluation Program (SEP) Integrated Assessment because the results of the SEP can impact the design of the AFWS modifications. In order to specify the possible impact which SEP could have on any required modifications, it was committed that the conceptual design would be provided for the modifications which would resolve the outstanding long term items. This conceptual design was developed as part of our ongoing review of the AFWS with respect to existing requirements and possible future SEP requirements. Accordingly, a preliminary sketch is provided as Enclosure 2 which describes the preferred option which is currently under consideration to improve the AFWS.

As can be seen from the sketch, the proposed conceptual design adequately resolves all three remaining open items. The design includes the upgrading of the alternate water supply to provide a safety grade source of water which will be qualified for seismic events and tornadoes and will be automatically aligned on low AFWS pump suction pressure. This portion of the design complies with TMI Long Term Recommendations 2 and 4. The proposed design also includes the installation of a third AFWS pump which will be electrically powered. This modification resolves the concern expressed in TMI Long Term Recommendation 5(b).

In order to complete the design of the improved AFWS, it is required that the SEP Integrated Assessment determine many of the design requirements. For example, in order to seismically qualify the new equipment, it will be necessary to establish the seismic design criteria which is an ongoing SEP effort. Additionally, the appropriate requirements associated with tornado protection, internally and externally generated missiles, pipe whip and jet impingement and flood are all a part of the ongoing SEP. For these reasons, it is appropriate that implementation of the modifications to the AFWS discussed above be deferred until after the SEP Integrated Assessment is completed.

It should be noted that the modifications described above are based on conceptual engineering. The final design will be dependent on the results of the SEP Integrated Assessment which may require changes to the existing conceptual design.

Enclosure 3 provides a description of the systems used for indication of auxiliary feedwater flow including the wide range steam generator level and an evaluation of the separation between the systems. This information was requested by the NRC staff during a telephone discussion on February 11, 1982.

If you have any questions or desire additional information regarding this subject, please contact me.

Very truly yours,

*KP Barber*

Enclosures

