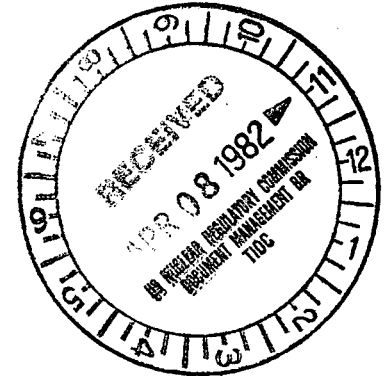


April 2, 1982

Docket No. 50-206
LS05-82-04-006



Mr. R. Dietch
Vice President
Nuclear Engineering and Operations
Southern California Edison Company
2244 Walnut Grovd Avenue
Post Office Box 800
Rosemead, California 91770

Dear Mr. Dietch:

SUBJECT: STEAM GENERATOR PLUGGING LIMIT - SAN ONOFRE NUCLEAR GENERATING STATION UNIT NO. 1

On June 8, 1981, the Commission issued License Amendment No. 55 to Provisional Operating License No. DPR-13 for the San Onofre Nuclear Generating Station (SONGS) Unit No. 1. The amendment authorized changes to the technical specifications which were required to allow SONGS Unit No. 1 to resume power operation for Cycle 8 following extensive repair to the steam generator tubes and, among other provisions, provided clarification of the preventative plugging limits. Our letter stated that we and your representatives mutually agreed to a change to your May 5, 1981 application to include a more conservative plugging limit of 40% for sleeve degradation until our review of your proposed limit of 54% degradation is completed.

In order to meet the provisions of Regulatory Guide 1.121, it is necessary to demonstrate that the degraded tubes have adequate wall thickness to preclude exceeding the yield stress during normal operation and adequate safety margins exist during postulated accident conditions. You have satisfied these two criteria with your proposed plugging limit of 54%. However, a third criterion specified in Regulatory Guide 1.121 requires that a margin of 3.0 against burst be maintained during normal operation. With the proposed plugging limit of 54%, this margin to burst under normal operating pressure would be 2.4 and, therefore, we find that it is unacceptable. Westinghouse has previously taken exception to this position, but the NRC staff continues to believe that the maintenance

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April 2, 1982

of this margin of three during normal operation is necessary for degraded as well as sleeved tubes. This staff position is consistent with acceptance criteria provided in ASME Code Section XI Subsection IWB.3521.1 which requires that the depth of an allowable O.D. indication not exceed 40% of the tube wall thickness. With this plugging limit, a margin of three against burst would be maintained during normal operation. Accordingly, we conclude that your proposed plugging limit of 54% tube degradation for sleeved tubes is not acceptable and that this limit should remain at 40%.

Please contact Mr. W. Paulson, NRC Project Manager for San Onofre Unit No. 1 if you have any questions regarding this matter.

Sincerely,

Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing

cc: See next page

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cc

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Chairman
Board of Supervisors
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Radiation Control Unit
Radiological Health Section
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Sacramento, California 95814

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