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

April 27, 1982

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 Emergency Procedures Upgrade San Onofre Nuclear Generating Station Unit 1

By letter dated April 7, 1982, you requested that we provide certain information regarding the concerns expressed by the NRC Staff during our meeting of March 2, 1982. These concerns were re-stated in the enclosure to your letter and involve the areas of analysis, procedures, and operator training, to improve our capabilities to respond to a postulated loss of secondary coolant accident. A response was requested by April 30, 1982.

The purpose of this letter is to advise you of the need to defer submittal of the requested information. This deferral is necessary due to the extensive scope of our efforts to resolve the NRC Staff's concerns. It has been determined that the best approach for the revision of the emergency procedures is to use the generic guidance provided in the Westinghouse Owners Group Emergency Response Guidelines (ERG), which were developed in response to NUREG-0737 requirements. These generic guidelines are being revised where applicable to provide plant specific guidelines for San Onofre Unit 1.

The development of plant specific guidelines for San Onofre Unit 1 requires that a large number of transients be re-analyzed where the existing San Onofre Unit 1 analysis is insufficient and where the San Onofre Unit 1 system configuration differs from the reference plant used for the ERG. The transients involved in this re-analysis include steamline break, feedline break, steam generator tube rupture, and a feed and bleed analysis required for loss of secondary heat sink.



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The schedule for completion of the emergency procedures upgrade is May 21, 1982, which is the target date to complete operator training. As a result of recent discussions with members of your staff, it has been indicated that the information requested could be provided as it becomes available starting the week of May 17, 1982. In this manner, the NRC's review of our effort would be accomplished on a schedule which supports our planned startup date of June 4, 1982.

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

Very truly yours,

Bushan