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December 28, 1987

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206
In-Service Testing Program for Pumps and Valves
San Onofre Nuclear Generating Station
Unit 1

The current ten year interval for In-Service Testing (IST) of pumps and valves at San Onofre Unit 1 commenced on January 1, 1978, and expires on January 1, 1988. The IST program for this current interval is based on the 1977 Edition of Section XI of the ASME Code, including Addenda through winter of 1979. In accordance with 10 CFR 50.55a, the IST program for the next ten year interval, which commences on January 1, 1988, will comply with the 1983 Edition of Section XI of the ASME Code, including Addenda through summer of 1983.

The enclosed Engineering Procedures S01-V-2.14 (draft Revision 8) and S01-V-2.15 (draft Revision 6), Pump Relief Requests numbered 1 through 8 and Valve Relief Requests numbered 1, 2, 3, 4, 5, 8 and 10 describe the IST program for pumps and valves for San Onofre Unit 1 for the next ten year interval and will take effect on January 1, 1988. There have been many changes since the previous submittals of this information to the NRC by Southern California Edison's (SCE's) letters dated January 24, 1984, June 15, 1984, September 11, 1984, April 10, 1985, March 3, 1986, July 3, 1986, August 18, 1986, March 17, 1987 and August 20, 1987. Of these newer changes, the substantive ones to the procedures have been highlighted by vertical bars and other notations. Changes to the relief requests are relatively few, but have been highlighted by vertical bars. The "TCN" notation is for SCE's internal control purposes and should be disregarded. As explained in the enclosures, Valve Relief Request No's. 7 and 9 were withdrawn previously and Valve Relief Request No. 6 is also now withdrawn.

It has been determined that the enclosed information meets the intent of Subsubarticle IWA-2420 of Section XI of the ASME Code (1983 Edition) regarding inspection plans and schedules for IST purposes. Based on this determination, no separate inspection plans or schedules have been prepared and none are under consideration.

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The IST program will be updated by SCE as required in the future. If this updating requires additional relief from the ASME Code Section XI requirements, then relief requests will be submitted for NRC approval in accordance with 10 CFR 50.55a(g)(5)(iii).

As a clarification, the In-Service Inspection (ISI) program will continue to comply with the 1974 Code Edition, including Addenda through summer of 1975 and the component repair and replacement program will continue to comply with the 1977 Code Edition, including Addenda through summer of 1978, during the period beyond January 1, 1988. This determination is based on the provisions of Subarticle IWA-2400 of Section XI, which permit an equivalent extension of the inspection interval if the power plant remained out of service continuously for at least "one year" (1974 Code Edition) or at least "six months" (1977 Code Edition) during the inspection interval. San Onofre Unit 1 was out of service continuously from April 9, 1980, to June 17, 1981, for refueling and steam generator sleeving, and again from February 26, 1982, to November 27, 1984, for seismic upgrades. The exact expiration date for the current ten year interval, as applicable to ISI and repair and replacement, will be established some time later, based on the above considerations as well as the future San Onofre Unit 1 refueling dates, as permitted by the ASME Code.

If you have any questions, please call me.

Very truly yours,



Enclosures

cc: D. Hickman, NRR Project Manager, San Onofre Unit 1
J. B. Martin, Regional Administrator, NRC Region V
F. R. Huey, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3

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SUBJECT: Forwards Draft Revs 8 & 6 to Engineering Procedures
 S01-V-2.14 & S01-V-2.15, respectively.

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