

June 5, 1989

Southern California Edison Company  
P. O. Box 800  
2244 Walnut Grove Avenue  
Rosemead, California 91770

Attention: K. P. Baskin, Vice President  
Nuclear Engineering, Safety and Licensing

Gentlemen:

Subject: Change Notice No. 29 to QA Program for San Onofre Units 1, 2 and 3

We have reviewed the changes addressed in Change Notice (CN) 29 to Topical Report SCE-1-A, "Quality Assurance Program", Amendment 11. CN No. 29 would allow for the procurement of safety-related (non-ASME Section III) material and equipment from nuclear utilities holding an NRC issued construction permit or operating license without SCE having to perform a quality assurance evaluation. Justification for CN No. 29 is based upon NRC's review and acceptance of the nuclear utility's QA program and ongoing NRC inspections of the utility's QA program implementation.

The agency position is that it is inappropriate for a licensee to use NRC licensing actions or inspection efforts as a basis for supplier evaluation and selection. The proper basis is the licensee's acceptance of the supplier's program and its implementation. We find that CN No. 29 does not continue to meet the requirements of 10 CFR 50, Appendix B; therefore, the change is unacceptable.

If there are any changes to other operative QA commitments existing in docketed correspondence outside of the SAR QA program description, you are obligated to notify this office. Implementing such changes should be based on 10 CFR 50.54(a)(3).

Should you have any questions regarding our review or if we can provide assistance, please contact W. J. Wagner at (415) 943-3731.

Sincerely,

*D. Kirsch for:*

R. P. Zimmerman, Director  
Division of Reactor Safety and Projects

cc:

J. G. Spraul, PQEB  
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