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October 31, 1989

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

Gentlemen:

**Subject: Docket No. 50-206
Status of Miscellaneous Outstanding Licensing Issues
San Onofre Nuclear Generating Station
Unit 1**

This letter provides the status of submittals on several projects which require rescheduling and summarizes several telephone discussions which have recently been held with the NRC staff in which we addressed the need for extension of the submittal dates. The staff has agreed that we should take the additional time necessary to ensure that complete and accurate responses are provided. Consistent with our discussions on October 24, 1989 the following is a status of the outstanding issues.

Details Regarding Permanent Modifications to 480 Volt System

Modifications to the 480 VAC System to provide long term corrective action to single failure susceptibility and potential overload conditions on the system are currently under review by SCE. In their safety evaluation report (SER) dated April 27, 1989, the NRC requested details of permanent modifications to correct these problems. Current plans include designing modifications to add an additional 480 VAC bus and a new transformer. These modifications would redistribute the loads on existing 480 VAC switchgear to reduce the maximum loading conditions on the main breakers, cables, and station service transformers to be within the current design limit during the worst case loading condition. Additional items requested in the SER were verification of a procedure revision and submittal of a proposed technical specification change which would require refueling interval surveillance on the tie breaker interlocks. SCE has revised the procedure governing the manual operation of 480 VAC system, S01-9-3, "480V Systems Operations." The revision to the procedure added precautions to prevent cross-training power sources on the switchgear by local manual actions. However, since the modifications to provide long term corrective action to this issue include deletion of

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interlocks between the two independent trains of safeguards, there would not be a need for the interlock surveillance. The staff has concurred in a discussion that these two issues were adequately addressed. A proposed change associated with the modified 480 Volt system modification will be submitted along with the design details of the modifications by approximately February 2, 1990.

Conformance to Requirements of Regulatory Guide 1.97

An NRC letter dated October 14, 1988 requested additional information concerning SONGS 1 conformance to Regulatory Guide 1.97 in order to complete the staff review. SCE informed the NRC staff in a recent telephone discussion that the development of the FTOL schedules for implementation of outstanding modifications impacted this response. Specifically, during our internal review of the responses to the NRC's questions it was identified that an assessment of the impact of our commitments to upgrade the hot leg recirculation system was required. In addition, since a modification was identified to provide a redundant steam pressure indication in the control room, further review is required. In order to complete these actions, responses to the request for additional information on RG 1.97 topics will be provided to the NRC by approximately December 31, 1989.

Revision of Containment Spray Actuation System Amendment Request

SCE's Amendment Application No. 162 addresses an open SEP topic which required that technical specifications on the Containment Spray Actuation System be provided. The NRC requested additional information regarding this subject by letter dated September 12, 1989. As part of our effort to respond to this request SCE has identified the need to revise the proposed technical specifications. A supplement to Amendment Application No. 162 will be provided to the NRC by approximately December 15, 1989.

Qualification Testing of Relays Associated With ATWS Modifications

The relays which SCE is procuring for use in the ATWS modifications require additional qualification testing. SCE committed to provide the results of the qualification testing of these relays to the NRC for their review. Consolidated Control Corporation Model 8N13 relays will be used in the ATWS mitigation system and the SPDS circuitry. Additional test plan requirements by SCE and inadequacies in the original test proposal from the vendor have together caused a delay in performance of the testing. Based on the current schedule of test completion, the submittal of the test results is expected by March 30, 1990.

October 31, 1989

Generic Letter 88-14, Instrument Air Testing Response

While preparing our response to Generic Letter 88-14 some concerns were raised on the pneumatic supplies to certain valves. On September 29 and October 16, 1989, SCE made 10 CFR 50.72 reports concerning valves in the containment spray system and the hot leg recirculation system which involve the instrument air system. As a result we are in the process of determining the impact of these issues as they relate to our response to Generic Letter 88-14. A schedule for responding to this issue will be provided to the NRC by separate letter in approximately two weeks.

NRC Bulletin 88-04, Potential Safety Related Pump Loss

In our response to Bulletin 88-04, it was indicated that a further evaluation of the feedwater pumps in the safety injection mode of operation was necessary. A calculation was performed and testing was completed during the Cycle 10 refueling outage. The NRC staff was informed of the results of this evaluation during recent discussions. We are finalizing our submittal and a formal letter documenting these results will be submitted to the NRC by approximately December 1, 1989.

Control Room Habitability

As a followup to the NRC's site visit on September 26 and 27, 1989, we committed to provide additional information in response to the NRC's recommendations on this issue. We indicated that a response could potentially be provided by the end of October, 1989. However, the effort to determine the outcome of implementing the recommendations on the radiological dose calculations is more extensive than originally anticipated. Therefore, the results will be provided by approximately January 15, 1990.

If you have any questions regarding these issues, please contact me.

Very truly yours,



cc: J. B. Martin, Regional Administrator, NRC Region V
C. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3