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VICE PRESIDENT

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November 6, 1989

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

Gentlemen:

Subject: **Docket No. 50-206**
Overpressure Mitigation System Amendment Requests
(TAC Nos. 71130 and 73622)
San Onofre Nuclear Generating Station, Unit 1

In a letter to SCE dated August 1, 1989 concerning the subject matter, Mr. C. M. Trammell of the NRC described deficiencies in SCE submittals and concluded that:

"In light of these observations, we believe that SCE needs to slow down and take a careful look at all aspects of the OMS technical specifications and bases and submit a single amendment that fully addresses and resolves all OMS issues."

We agree with this conclusion, and are proceeding with a detailed and comprehensive review of the design bases of the OMS. We expect to submit an Amendment Application with revised Technical Specification requirements by the end of January 1990.

In addition, we have conducted a review of the generic causes of the submittal deficiencies. The purpose of this letter is to summarize the results of that review and the corrective action which is being taken to prevent recurrence. The deficiencies included:

- o A nonconservative Power Operated Relief Valve (PORV) setpoint for the OMS
- o An incorrect statement of operability requirement for OMS
- o Errors in OMS-related design calculations

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Nonconservative PORV Setpoint

In April 1989, during a review related to Information Notice 89-32, SCE determined that the Inservice Testing (IST) program for valves did not include determination of a PORV opening response time. The response time was measured and found to be nonconservative with respect to the OMS setpoint analysis. Also, it was determined that the setpoint stated in Technical Specification 3.20 is not consistent with the heatup and cooldown curves of Technical Specification 3.1.3. This was reported to the NRC in Licensee Event Report No. 89-013, dated May 4, 1989.

SCE has previously described to the NRC its program to consolidate and strengthen the technical support provided to San Onofre and to improve accessibility of design basis documentation. In addition, as a result of the review of the OMS submittal deficiencies, the procedure for preparation of amendment applications has been revised to broaden its scope and increase formal attention to detail.

OMS Operability Requirements

In October 1988, SCE submitted a Technical Specification change with the stated intent to satisfy the NRC's conclusion in the November 1982 SEP that the OMS should be in service whenever the Residual Heat Removal (RHR) System is in operation, to provide added assurance of RHR System integrity. However, the change as submitted did not fully conform with the SEP conclusion, and SCE did not identify the difference or provide a technical justification.

All licensing personnel have been counseled concerning this submittal and concerning SCE's requirement that NRC submittals must include all information of relevance and interest to the NRC.

Errors In OMS-Related Design Calculations

A number of errors in OMS-related design calculations have been identified, as discussed in a Licensee Event Report dated October 16, 1989. These include assuming flow from only one charging pump, and they result in the potential under some circumstances to exceed 10CFR50 Appendix G pressure limitations.

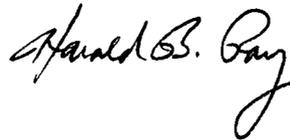
Administrative controls have been implemented which require the OMS to be in service, and limit operable charging pumps to one, whenever Reactor Coolant System (RCS) temperature is below 360 degrees F or the RHR System is in operation, regardless of pressurizer level. These controls will ensure that RCS pressure does not exceed 10 CFR 50 Appendix G pressure limitations whenever the RHR system is in operation.

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The actions taken by SCE to upgrade its technical support functions for San Onofre, and to strengthen the process of developing bases for NRC licensing submittals, will reduce the potential for similar errors in the future. The identification of these errors is a result of the thorough review process which is now being implemented.

If you have any questions or comments concerning the above, or if you would like additional information, please let me know.

Sincerely,

A handwritten signature in cursive script, appearing to read "Harold B. Gray".

cc: J. B. Martin, Regional Administrator, NRC Region V
C. Caldwell, NRC Senior Resident Inspector, San Onofre