

March 26, 1990

Docket No. 50-206

Mr. Harold B. Ray
Vice President
Southern California Edison Company
Irvine Operations Center
23 Parker
Irvine, California 92718

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Dear Mr. Ray:

SUBJECT: 10 CFR 50.59 REVIEW METHODOLOGY SAN ONOFRE NUCLEAR GENERATING
STATION, UNIT NO. 1 (TAC NO. 76040)

By letter dated February 2, 1990, you summarized your application of NSAC/125 guidance in satisfying the requirements of 10 CFR 50.59 for a change that was identified relative to auxiliary feedwater flow rate (LER 89-031). We have reviewed your letter and the 10 CFR 50.59 evaluation that was completed (NCR S01-P-7441, Rev. 1); and, while we agree with your operability assessment, we do not agree with your implementation of NSAC/125. Although you made reference to certain parts of NSAC/125 in your 50.59 evaluation, you failed to implement the methodology suggested by NSAC/125 in focusing your review efforts. Consequently, it is not possible for us to draw a conclusion with respect to whether an unreviewed safety question is involved based on the evaluation that was performed.

Although we take exception to your methodology for completing your 50.59 evaluation in this particular instance, we recognize that you have taken the initiative to improve the quality of your review efforts. Therefore, as Enclosure 1 to this letter, we have included specific comments for your consideration. For completeness, we have also included NCR S01-P-7441 Rev. 1 as Enclosure 2. We do not consider our comments to be all inclusive, but we believe they may be helpful in improving your review efforts.

We do not expect you to submit your revised 50.59 evaluation for our review, as the resident inspectors will review your efforts in this regard. Additionally, we do not request a specific response to this letter.

Sincerely,
original signed by

James E. Tatum, Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

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PDR ADDCK 05000206
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Enclosure: As stated

cc w/enclosures:
See next page

DRSP/PD5
PShea
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OTSB
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3/22/90

DRSP/PD5
JTatum:dr
3/21/90

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CTrammell
3/26/90

DF01
1/1

MA-4



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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Vice President
Southern California Edison Company
Irvine Operations Center
23 Parker
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Sincerely,

A handwritten signature in cursive script, reading "James E. Tatum", is written over a horizontal line.

James E. Tatum, Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/enclosures:
See next page

Mr. Harold B. Ray
Southern California Edison Company

San Onofre Nuclear Generating
Station, Unit No. 1

cc
David R. Pigott
Orrick, Herrington & Sutcliffe
600 Montgomery Street
San Francisco, California 94111

Mr. Richard J. Kosiba, Project Manager
Bechtel Power Corporation
12440 E. Imperial Highway
Norwalk, California 90650

Mr. Robert G. Lacy
Manager, Nuclear
San Diego Gas & Electric Company
P. O. Box 1831
San Diego, California 92112

Mr. Phil Johnson
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Resident Inspector/San Onofre NPS
U.S. NRC
P. O. Box 4329
San Clemente, California 92672

Mayor
City of San Clemente
San Clemente, California 92672

Chairman
Board of Supervisors
County of San Diego
1600 Pacific Highway Room 335
San Diego, California 92101

Regional Administrator, Region V
U.S. Nuclear Regulatory Commission
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Mr. John Hickman
Senior Health Physicist
Environmental Radioactive
Management Unit
Environmental Management Branch
State Department of Health Services
714 P Street, Room 616
Sacramento, California 95814

Mr. Don Womeldorf
Chief Environmental Management
California Department of Health
714 P Street, Room 616
Sacramento, California 95814

COMMENTS RE: 10 CFR 50.59

EVALUATION (NCR S01-P-7441, REV. 1)

1. NSAC/125 (page 3-1 and Attachment A) breaks the 50.59 evaluation down into seven questions. This technique provides focus for the evaluation effort and the licensee is less likely to be side tracked if this methodology is implemented. SCE apparently did not use this methodology and, in several instances (discussed below), the licensee's evaluation was not properly focused.
2. In discussing the probability of occurrence of an accident or malfunction of equipment, SCE did not identify those accidents or that equipment relevant to the evaluation. A determination must be made as to whether the original accident assumptions have been affected by the change. An independent reviewer should be able to identify the following information in the evaluation:
 - a. Relevant accidents and equipment under consideration.
 - b. Probabilities of accident occurrence or equipment malfunction originally assumed by the accident analyses, and how these assumptions are affected by the change.
 - c. Logic that was used in reaching a conclusion.
3. The consequences of an accident and malfunction of equipment should be addressed in terms of off-site dose (NSAC/125, pg 3-5). Off-site dose did not appear to be a primary consideration in the licensee's evaluation.
4. Recognizing that San Onofre Unit 1 is an older plant and the accident analyses may not be well defined, particular attention should be directed to NSAC/125, pg 3-7:

"The possible accidents or malfunctions of a different type are limited to those that are as likely to happen as those considered in the SAR."

The evaluation should define those accidents and equipment malfunctions that could occur and how these scenarios are bounded by the current accident analyses.

5. When addressing reductions in the margin of safety, the licensee defined the following basis for Technical Specification 4.1.9:

"...the design of the AFWS ensures sufficient AFW flow without exceeding water hammer limits for all applicable design basis events with or without a LOP and a single active failure."

The licensee did not define the "margin of safety," however, and how that margin is affected by the change.