

June 11, 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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JTatum	ACRS (10)

Dear Mr. Ray:

SUBJECT: PROCEDURES GENERATION PACKAGE REVIEW FOR SAN ONOFRE NUCLEAR  
GENERATING STATION, UNIT NO. 1 (TAC NO. 44340)

We have reviewed your submittals dated April 12, 1985, June 8, 1988 and October 19, 1989, relating to the procedures generation package (PGP) for San Onofre Unit 1. Our Safety Evaluation is enclosed for your information.

We have concluded that your submittals are sufficient to enable the NRC staff to conduct an inspection of your Emergency Operating Procedures (EOPs) and complete the review process. Resolution of findings from the EOP inspection will constitute approval of the PGP for San Onofre Unit 1.

Future revisions to your PGP and EOPs should be made in accordance with QA program requirements and records of all revisions should be maintained in an auditable form. No further submittals are required unless specifically requested.

Please contact us if you should have any questions regarding this matter.

Sincerely,

/s/

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

Enclosure:  
Safety Evaluation

cc w/enclosure:  
See next page  
\*See previous concurrence

DRSP/PDV\*  
PShea  
6/4/90

HFAB *SShankman*  
SShankman  
6/6/90  
DISCUSSED WITH  
G. GALLETTI

DRSP/PM  
PEng  
6/8/90

DRSP/PDV  
JTatum:sg  
6/5/90

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(A)DRSP/D:PDV  
JLarkins  
6/11/90

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

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Please contact us if you should have any questions regarding this matter.

Sincerely,

A handwritten signature in cursive script, reading "James E. Tatum", is written over the typed name and title.

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

Enclosure:  
Safety Evaluation

cc w/enclosure:  
See next page

Mr. Harold B. Ray  
Southern California Edison Company

San Onofre Nuclear Generating  
Station, Unit No. 1

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Sacramento, California 95814



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

ENCLOSURE

SAFETY EVALUATION REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO THE PROCEDURES GENERATION PACKAGE  
SOUTHERN CALIFORNIA EDISON COMPANY  
SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 1  
DOCKET NO. 50-206

INTRODUCTION

The "TMI Action Plan" (NUREG-0660 and NUREG-0737) required licensees of operating reactors to reanalyze transients and accidents and to upgrade emergency operating procedures (EOPs) (Item I.C.1). The plan also required the NRC staff to develop a long-term plan that integrated and expanded efforts in the writing, reviewing, and monitoring of plant procedures (Item I.C.9). NUREG-0899, "Guidelines for the Preparation of Emergency Operating Procedures," describes the use of a "Procedures Generating Package" (PGP) to prepare EOPs. A PGP is required by Generic Letter 82-33, Supplement 1 to NUREG-0737, "Requirements for Emergency Response Capability." The generic letter requires each licensee to submit a PGP, which includes:

- a. Plant-specific technical guidelines,
- b. A writer's guide,
- c. A description of the program to be used for the validation of EOPs, and
- d. A description of the training program for the upgraded EOPs.

This report documents the review of the Southern California Edison Company (SCE) program for the development and implementation of Emergency Operating Instructions (EOIs) for San Onofre Nuclear Generating Station, Unit 1 (SONGS1).

The review was conducted to determine the adequacy of the SCE program for preparing, implementing, and maintaining upgraded EOPs for SONGS1. The review was based on NUREG-0800, subsection 13.5.2, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants." Section 2 of this report briefly discusses the SCE submittal, the NRC staff review, and the acceptability of the submittal. Section 3 contains the staff's conclusions.

EVALUATION AND FINDINGS

SCE transmitted the PGP for SONGS1 in a letter from M. O. Medford (SCE) to J. A. Zwolinski (NRC) dated April 12, 1985. The NRC requested additional information in order to continue its review of the SONGS1 PGP in a letter from R. F. Dudley, Jr. (NRC), to K. P. Baskin (SCE) dated July 9, 1987.

SCE responded to this request in a letter dated June 8, 1988, from M. O. Medford (SCE), including SCE plans to update or consider update of the EOLs and EOL writer's guide or the justification for not doing so. In this letter, SCE also committed to notify the NRC of the status of these updates by January 3, 1989.

Following some delay, SCE transmitted the detailed status update of responses to NRC recommendations and comments on the SONGS1 PGP in a letter dated October 19, 1989. The update was a revision of the SCE June 8, 1988, submittal to the NRC and detailed the actions taken as well as responses to those NRC comments considered by SCE to be inappropriate or unnecessary for the SONGS1 EOP program.

An inspection of the SONGS1 EOPs under Temporary Instruction 2515/92, Revision 1, is scheduled for June 1990. The effectiveness of the current SONGS1 EOP program to ensure high quality EOPs will be evaluated as a part of this inspection.

#### CONCLUSIONS

The NRC staff has reviewed the PGP submitted by SCE for SONGS1 and found that these submittals, in conjunction with the scheduled inspection of the current program, will be sufficient to complete the review. Resolution of findings from the EOP inspection will constitute approval of the SCE PGP for SONGS1.

PGP revisions should not be submitted to the NRC. For items the licensee deems inappropriate or no longer applicable for inclusion in its PGP, it should develop and maintain documented justification in an auditable form. Additionally, all revisions to the PGP should be reflected in plant EOPs within a reasonable period of time (e.g., the next planned revision of the EOPs).

Principal Contributor: G. Galletti

Dated: