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Southern California Edison Company

23 PARKER STREET

IRVINE, CALIFORNIA 92718

HAROLD B. RAY
SENIOR VICE PRESIDENT

July 18, 1990

TELEPHONE
714-458-4400

Mr. S. A Richards, Chief Reactor Projects Branch
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Dear Mr. Richards:

Subject: **Docket Nos. 50-206, 50-361 and 50-362**
Voluntary Entry Into Action Statements
San Onofre Nuclear Generating Station, Units 1, 2 and 3

The purpose of this letter is to affirm our commitment to comply with limitations on voluntary entry into Technical Specification action statements, as discussed in your letter dated June 29, 1990 which forwards Inspection Report No. 90-22. Your letter includes the following:

"NRC requirements permit voluntary entry into an action statement for the period allowed, recognizing that this is necessary at times for purposes of testing and maintenance. However, the NRC does not consider that repeated entry into an action statement can be done for convenience in a manner which effectively extends the out-of-service period allowed by the action statement. In such cases, action should be taken to comply with the Technical Specifications (TS), obtain TS relief, or change the TS requirements."

We agree with your description of the limitations on voluntary entry into TS action statements. In the specific case described in Inspection Report No. 90-22 which gave rise to the issue in this instance, SCE several times opened a containment isolation valve, which was being administratively controlled as if it were included in the TS and which had failed its IST with respect to closure time, for the purpose of using steam generator blowdown to maintain chemistry control. This was done pending identification and correction of the cause of slow valve closure time. The duration of the open period was limited each time by the action statement for similar valves which are included in the TS.

In the future, we will seek TS relief in accordance with Dr. Murley's February 22, 1990 memo to the Regional Administrators in those circumstances when we believe entry into

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Mr. S. A. Richards

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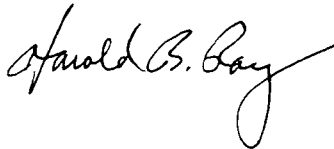
July 18, 1990

a TS action statement for purposes other than testing and maintenance is appropriate. Appropriate steps will also be taken to obtain your agreement in situations where administrative controls are being exercised as if TS requirements were applicable.

With respect to revision of the TS for San Onofre Unit 1 to clarify and extend applicability, and to resolve conflicts, we continue to experience difficulty in addressing the many separate issues piecemeal. We believe we need to focus our efforts on a priority basis, considering which issues are most important first. Therefore, we conclude that we will have to continue to rely for some time on administrative controls in many cases to provide appropriate requirements for plant operation.

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

Sincerely,

A handwritten signature in cursive script, reading "Harold B. Ray". The signature is written in dark ink and is positioned below the word "Sincerely,".

cc: Mr. John B. Martin, Regional Administrator, Region V
Mr. C. W. Caldwell, NRC Senior Resident Inspector, SONGS