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 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Discusses corrective actions to be taken in response to QA & seismic design problems. No indication of significant deficiencies or inadequacies in QA process found. Internal audit & assessment will be performed independently.

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December 3, 1981

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

Subject: Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

The purpose of this letter is to discuss the actions Southern California Edison Co. (SCE) has taken and plans to take in regard to San Onofre Units 2 & 3 as a result of the quality assurance/seismic design problems recently identified at the Diablo Canyon Nuclear Power Plant. Since the initial discovery of the Diablo Canyon problems, we have followed the course of events closely, including meeting with PG&E to enhance our understanding of the problems, talking with consultants working on the problems, and reviewing NRC and other available documentation.

The seismic design of San Onofre 2 & 3 was performed for SCE by Bechtel which had designed 55 nuclear plants prior to San Onofre 2 & 3. The initial project seismic design basis was the most severe ever utilized in the design of a nuclear plant. That design basis has remained unchanged throughout the life of the project notwithstanding almost constant scrutiny by both the NRC and SCE and their consultants. Because of the severity of the design basis, its application to structural and component design has received more attention, both internal and external to the project, than a lesser design basis would have received.

SCE has a large and competent quality assurance organization consisting of 68 personnel. This organization is completely independent of the engineering and construction activities of the company in that it reports to a separate vice president. The SCE quality assurance organization serves both as a check on engineering work originating within SCE and as a second level check on work performed for SCE by Combustion Engineering (C-E) and Bechtel. These companies have their own independent quality assurance organizations.

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SCE, Bechtel and C-E quality assurance programs, consistent with the requirements of 10 CFR 50, Appendix B, have been in place since the inception of the project. Their programs have included formal and proceduralized interface controls. SCE has conducted 81 audits of the Bechtel design office. In addition Bechtel has conducted 125 internal audits. Although these programs, like all on-going programs, have undergone improvement and upgrading throughout the intervening years, continuity has been maintained throughout.

In addition since 1975 SCE has had a separate organization responsible for records management, including San Onofre 2 & 3 engineering documents. The staffing of this organization includes 75 personnel at the San Onofre site and 60 personnel at corporate headquarters. This activity in conjunction with the ongoing QA program provides assurance of the completeness and accessibility of project records.

Soon after identification of the Diablo Canyon problem SCE initiated a reassessment of the adequacy of the quality assurance and seismic design processes associated with San Onofre 2 & 3. This reassessment consisted of an audit of the Bechtel design process using SCE quality assurance and engineering personnel. This audit has been completed and reveals no programmatic deficiencies in either seismic design or quality assurance.

SCE has no indication that the quality assurance and seismic design processes applied to San Onofre are in any significant way deficient or otherwise inadequate. On the contrary, all indications are that the design was properly and correctly executed and implemented.

Nevertheless, in order to supply even greater assurance of the adequacy of San Onofre 2 & 3 design, SCE has retained General Atomics to conduct an independent verification of the San Onofre 2 & 3 seismic design, from the approved design basis through construction implementation. General Atomics has not been a part of the project seismic design and the review will be managed by and staffed by General Atomics. This activity will report to Mr. D. J. Fogarty, Senior Vice President of SCE. SCE will advise the NRC by December 18, 1981 of the schedule for this verification.

In summary, because of the following project features, SCE is confident that the problems recently identified at Diablo Canyon have not occurred at San Onofre 2 & 3:

1. The continuity and high level of effectiveness of our quality assurance program throughout the duration of the project,
2. The continuity of seismic design criteria and the depth of Bechtel design and quality assurance experience, and
3. The corporate documentation control process.

Mr. Harold Denton

Page 3

December 3, 1981

Despite these considerations, SCE has taken two actions (an internal audit and an assessment performed by an independent firm) to provide even more assurance of the adequacy of San Onofre 2 & 3 seismic design.

If you have any questions or comments concerning this matter, please contact me.

Very truly yours,

Robert Dietrich