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 FACIL: 50-361 San Onofre Nuclear Station, Unit 2, Southern California 05000361
 50-362 San Onofre Nuclear Station, Unit 3, Southern California 05000362
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 DIETCH, R. Southern California Edison Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director
 EISENHUT, D. G. Division of Licensing

SUBJECT: Forwards GAI Cbl 820120 ltr confirming fiscal independence. GAI
 Co was selected to perform independent verification of
 facilities seismic design & effectiveness of QA program.

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SCE

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ROBERT DIETCH

VICE PRESIDENT

TELEPHONE

213-572-4144

January 22, 1982

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

Attention: Mr. Darrell G. Eisenhut

Dear Mr. Denton:

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



By letter dated December 29, 1981, Southern California Edison Company (SCE) transmitted to the NRC documents to perform an independent verification of the San Onofre Units 2 and 3 seismic design and effectiveness of quality assurance program.

To perform this work, SCE selected General Atomic Company (GA). One of the several criteria applied to select GA was that they have fiscal independence from SCE. Enclosed is a letter dated January 20, 1982 from Mr. Harold Agnew, President of GA, confirming their independence.

During our discussions with you on January 13, 1982, you requested that our program should include independent analysis of certain features by performing design calculations. Accordingly, we are increasing GA's scope of work to include this additional effort which will be completed and addressed in the final report.

In selecting the features to be independently analyzed, GA has applied the following criteria:

- a) The features shall have been reviewed under Subtask C3 of the Program Plan.
- b) The features shall have clearly defined analytical interfaces.

Boo!
S.I.

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January 22, 1982

SCE

- c) The features shall have seismic loads that are a significant fraction of total loads.
- d) The features shall have a relatively low design margin.

The features selected by GA to perform the independent analysis are:

- 1. Low Pressure Safety Injection (LPSI) pump and support mat ending at the concrete base slab.
- 2. Safety Injection Tank ending at the Combustion Engineering and Bechtel (CE-BPC) interface.

If you have any questions on GA's fiscal independence, or on the independent analysis, please contact me.

Very truly yours,

Robert Ditch

Enclosure

cc: NRC Region V
R. H. Engelken (with enclosure)



GENERAL ATOMIC

GENERAL ATOMIC COMPANY
P.O. BOX 81608
SAN DIEGO, CALIFORNIA 92138
(714) 455-2080

H. M. AGNEW
President

January 20, 1982

Mr. David J. Fogarty
Executive Vice President
Southern California Edison
P. O. Box 800
Rosemead, California 91770

Dear Mr. Fogarty,

There has been considerable discussion concerning the fiscal independence of General Atomic Company from Southern California Edison Company. I believe several succinct statements will clarify the situation and confirm my position as stated in my meeting with you and Mr. H. Denton of the NRC on January 13, 1982.

First, General Atomic Company is the entity that should be considered. Torrey Pines Technology, the commercial division responsible for this contract, is not a subsidiary or separate company. It is simply one of several commercial divisions that handle various aspects of our business. These commercial divisions draw personnel from the common resources of General Atomic.

Second, the revenue received from contracts associated with San Onofre Units 2 and 3 is less than 1% of General Atomic's revenue over the past two years.

Third, the revenue received from all contracts with Southern California Edison, Bechtel Power Corporation and Combustion Engineering, the owner and two major contractors on San Onofre Units 2 and 3, was 3% of General Atomic's revenue over the past two years. This figure includes all revenue from the above three corporations, including work associated with San Onofre Units 2 and 3 and all other contracts.

I believe these three points clearly indicate our fiscal independence.

Sincerely,