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SUBJECT: Forwards updated status of outstanding items identified in Tables 5-1 (balance of plant equipment) & 5-2 (NSSS equipment) of Revision 2 to "Environ Qualification Rept per Requirements of NUREG-0588."

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February 2, 1982

Director, Office of Nuclear Reactor Regulation
Attention: Mr. Frank Miraglia, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

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

SCE's letter of November 6, 1981 submitted Revision 2 to the "Environmental Qualification Report per Requirements of NUREG-0588" for San Onofre Units 2 and 3. During a conversation on January 22, 1982, the NRC Environmental Qualification Branch (EQB) reviewer (Mr. N. B. Le) requested that SCE provide an updated status of outstanding items identified in Table 5-1, Outstanding Items - BOP Equipment and Table 5-2, Outstanding Items - NSSS Equipment, of Revision 2.

Consistent with the January 22, 1982 discussion with the NRC EQB reviewer, enclosed please find the updated status of outstanding items identified in Tables 5-1 and 5-2 of Revision 2 to the Environmental Qualification Report for San Onofre Units 2 and 3. The enclosure provides information which indicates that all equipment which is required to meet NUREG-0588 guidelines for a Category II plant, either presently complies with the guidelines or will comply with the NUREG-0588 guidelines prior to fuel load.

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

Very truly yours,

K P Baskin

Enclosures

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S/1

ENCLOSURE

Status of Outstanding Items Identified in Table 5-1 Outstanding Items - BOP Equipment and Table 5-2 Outstanding Items - NSSS Equipment of the "Environmental Qualification Report per Requirements of NUREG-0588, Revision 2"

All equipment which is required to meet NUREG-0588 guidelines for a Category II plant, either presently complies with the guidelines or will comply with the NUREG-0588 guidelines prior to fuel load. However, some equipment will not be assigned a qualified life until additional aging analysis or testing has been completed. SCE considers that all required equipment is qualified to at least the IEEE 329-1971 standard (Category II requirements of NUREG-0588), and that the equipment not presently assigned a qualified life is acceptable for use during the first fuel cycle and will be assigned a qualified life prior to the completion of the first refueling outage. The updated status of outstanding items identified in Tables 5-1 and 5-2 are as follows:

1) Rosemount Transmitters (Item A4 of Table 5-2)
   Foxboro Transmitters (Item A5, A6, A8 of Table 5-2)
   GEMS Transmitters (Item A4 of Table 5-1)

   These transmitters all have qualification documentation available which meets IEEE 323-1971 requirements. Since SONGS 2&3 is a Category II plant, this is adequate to comply with NUREG-0588 requirements. The qualification documentation, however, is based on the testing of unaged components, and with the exception of the Rosemount transmitters, separate effects testing methods were used in the qualification process.

In order to improve the pedigree of qualification and to establish a reasonable qualified life, SCE has joined with other utilities to qualify the transmitters to IEEE 323-1974 specifications. The GEMS and Foxboro transmitter qualification programs use transmitters identical or similar to those installed in SONGS 2&3, thus completion of the qualification programs, due in mid-1982, will result in instruments qualified to IEEE 323-1974 standards and which will have a realistic qualified life. The Rosemount transmitters being tested are of an improved quality above the SONGS 2/3 installed transmitters, and SCE has committed to replacing the existing transmitters with the more advanced pedigree models during the first refueling outage following completion of the testing program.

As indicated in previous submittals, it should be noted that all transmitters have qualification documentation in accordance with IEEE 323-1971 and that SCE intends to defer assigning a qualified life until the current test activities are completed. SCE contends that the period of time between fuel load and first refueling (which is the final date by which SCE has committed to provide a final qualification package on any of these items), will not sufficiently degrade the transmitters due to aging or negate the existing test qualification, thus the transmitters are acceptable for operation during the first fuel cycle.

2) Auxilliary Feedwater Pump Motor (Item A1 of Table 5-1)

All qualification testing has been completed and analyzed. The motor has been assigned a qualified life of 40 years. The data file is complete and in the process of being transmitted to the Central File at SONGS 2&3. This item is considered closed.

3) Pressurizer Relief Valve Position Indication System (Item A2 of Table 5-1)
Containment Radiation Monitor Instrumentation (Item A3 of Table 5-1)

All qualification testing has been completed. The vendor information/ qualification package has received a preliminary review and found to be acceptable. Final review of the qualification package is in progress and will be completed with assignment of a qualified life prior to fuel load.

4) Resistance Temperature Detectors
Excore Nuclear Instrumentation Detector, Preamplifier/Filter Assembly and Cabling (Item A3 of Table 5-2)

All qualification testing has been completed. An aging analysis is in progress to determine a qualified life for the equipment. This analysis will be complete prior to the first refueling outage. Based on the completed qualification package, the equipment is considered acceptable for use during the first cycle of operation, since the age degradation due to first cycle operation is negligible.

5) Valve Motor Operators (Item A9 of Table 5-2)

All SONGS 2&3 valve motor operators have been qualified to both IEEE 323-1974 and IEEE 382-1974 standards. The standards require only a 2000 cycle preaging; however, there exists evidence that certain valves will have an actual life of greater than 2000 cycles over a 40 year life-of-plant. SCE is endeavoring to have the vendor supply confirmatory material to substantiate a life in excess of 2000 cycles. The subject valves, however, will not experience aging in excess of 2000 cycles prior to first refueling; therefore, the valves are qualified for use during first fuel cycle.

6) Resistance Temperature Detector (Item A2 of Table 5-2)
Pressure Transmitters (Foxboro) (Item A5 of Table 5-2)
Excore Nuclear Detector (Item A13 of Table 5-2)

These items require response time testing. With the exception of the Pressure Transmitters, the testing will be performed periodically in accordance with Technical Specification requirements. Failure to meet the requirements results in actions dictated by the Technical Specifications. The pressure transmitter response time testing has been completed, the data has been evaluated and found to be acceptable and the results have been included in the data file.