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 AUTH. NAME AUTHOR AFFILIATION  
 BASKIN, K.P. Southern California Edison Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 MIRAGLIA, F. Licensing Branch 3

SUBJECT: Forwards preliminary evaluation of EPRI program test results demonstrating capability of safety valves to operate under unexpected & accident conditions, per requirements of NUREG-0737 Item II.D.1, "Relief & Safety Valve Testing."

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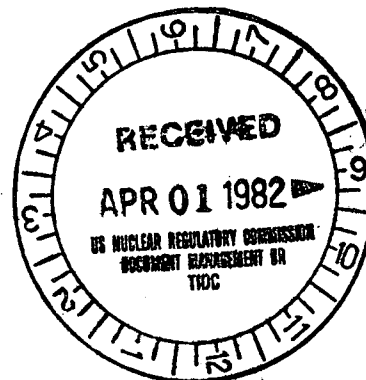
P. O. BOX 800  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CALIFORNIA 91770

K. P. BASKIN  
MANAGER OF NUCLEAR ENGINEERING,  
SAFETY, AND LICENSING

TELEPHONE  
(213) 572-1401

April 1, 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

Item II.D.1, Relief and Safety Valve Testing, of NUREG 0737 as clarified by the NRC's letter of September 29, 1981 required Pressurized Water Reactor (PWR) Licensees to submit a preliminary evaluation of test results which demonstrate the capability of relief and safety valves to operate under expected operating and accident conditions by April 1, 1982 and to submit a final evaluation including analysis of discharge piping systems by July 1, 1982. This requirement has been identified as condition (19)j of Operating License No. NPF-10 for San Onofre Unit 2.

Consistent with this requirement, enclosed please find a preliminary evaluation of the Electric Power Research Institute (EPRI) program test results which demonstrate the capability of the Dresser 31709 NA Safety Valves used at San Onofre Units 2 and 3 to operate under expected operating and accident conditions. A final evaluation of the EPRI program test results including an analysis of discharge piping systems will be provided by July 1, 1982.

If you have any questions or comments concerning the enclosed information, please contact me.

Very truly yours,

Enclosures

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C PDR

PRELIMINARY EVALUATION SUPPORTING  
PRESSURIZER SAFETY VALVE OPERABILITY  
SAN ONOFRE UNITS 2&3

Item II.D.1, Relief and Safety Valve Testing, of NUREG-0737 as clarified by the NRC's letter of September 29, 1981, required Licensees with Pressurized Water Reactors (PWR) to submit a preliminary evaluation of test results which demonstrate the capability of relief and safety valves to operate under expected operating and accident conditions by April 1, 1982 and to submit a final evaluation including analysis of discharge piping systems by July 1, 1982. This requirement has also been identified a condition (19)j of Operating License No. NPF-10 for San Onofre Unit 2.

Consistent with this requirement, the following discussion provides a preliminary evaluation of test results which demonstrate the capability of the San Onofre Units 2 and 3 Safety Valves to operate under expected operating and accident conditions.

Southern California Edison (SCE) is a participant in the Generic PWR Safety and Relief Valve Test Program implemented by the Electric Power Research Institute (EPRI) at the request of participating PWR Utilities in response to the USNRC recommendations for safety and relief valve testing.

The primary objective of the Test Program was to provide full scale test data confirming the functionability of primary system power operated relief valves (PORVs) and safety valves for expected operating and accident conditions. The second objective of the program was to obtain sufficient piping thermal hydraulic load data to permit confirmation of models which may be utilized for plant unique analysis of safety and relief valve discharge piping systems. Relief valve tests were completed in August, 1981 and safety valve tests were completed in December, 1981. Since PORVs are not utilized in the San Onofre 2 and 3 design, only the safety valve and piping portions of the EPRI program are applicable.

The following is a listing and brief description of reports prepared by EPRI documenting the results of the Safety and Relief Valve Test Program. These reports have been included as part of a submittal dated April 1, 1982 to Mr. H. R. Denton of the NRC from Mr. David Hoffman of Consumers Power Company on behalf of all PWR utilities participating in the EPRI test program.

1. EPRI PWR Safety and Relief Valve Test Program Valve Selection/  
Justification Report

This report documents that the valves selected in the EPRI PWR Safety and Relief Valve Test Program represent all the valves used in participating plants.

San Onofre Units 2 and 3 utilize Dresser 31709 NA Safety Valves which were tested as part of EPRI test program.

- 2A. EPRI/PWR Safety and Relief Valve Test Program Test Condition Justification Report
- 2B. Valve Inlet Fluid Conditions for Pressurizer Safety and Relief Valves in Combustion Engineering - Designed Plants

These two reports define and justify the range of the valve test conditions expected for all participating PWR plants (2A) and specifically for all participating CE plants (2B). San Onofre Units 2 and 3 are CE plants.

3. EPRI PWR Safety and Relief Valve Test Program Safety and Relief Valve Test Report

This report provides evidence demonstrating the functionability of the selected test valves under the selected test conditions for all participating PWR plants.

4. Evaluation of RELAP 5/MOD 1 for Calculation of Safety and Relief Valve Discharge Piping Hydrodynamic Loads

This report represents an analytical model benchmarked against test data that may be used for plant specific analysis of safety and relief valve discharge piping systems.

SCE has performed a preliminary review of reports described above and conclude that the valves tested include valves which represent the safety valve design for San Onofre Units 2 and 3, that the corresponding test conditions envelop the range of expected operating and accident conditions for San Onofre Units 2 and 3 and that the reports provide evidence confirming the adequacy of the San Onofre Units 2 and 3 safety valves.

The reports described above are also being used to perform the final plant-specific evaluation for San Onofre Units 2 and 3. The final safety valve evaluation and the analysis of discharge piping loads are in progress and will be submitted to the NRC by July 1, 1982.