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ACCESSION NBR: 8204070430 DOC. DATE: 82/04/05 NOTARIZED: NO DOCKET #
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 50-362 San Onofre Nuclear Station, Unit 3, Southern Californ 05000362
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 FOGARTY, D.J. Southern California Edison Co.
 RECIP. NAME RECIPIENT AFFILIATION
 EISENHUT, D.G. Division of Licensing

SUBJECT: Forwards three vol final rept by GA, "Independent ^{SEE PRL 2} Verification of San Onofre Nuclear Generating Station Units 2 & 3 Seismic Design & QA Program Effectiveness." Prompt review requested to support timely issuance of OL.

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DAVID J. FOGARTY
EXECUTIVE VICE PRESIDENT

TELEPHONE
213-572-2796

April 5, 1982

Director, Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut,
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555



Gentlemen:

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

By letter dated December 9, 1981, Southern California Edison Company (SCE) advised the NRC of its plans to conduct an independent verification of the seismic design and effectiveness of the quality assurance program of San Onofre, Units 2 and 3. This program was initiated by SCE in recognition of the current nuclear licensing environment and not because of any indications of problems. During the course of design and construction, quality assurance has been carefully pursued as a matter of Corporate policy.

Notwithstanding SCE's high level of confidence in the design and quality assurance of San Onofre, Units 2 and 3, General Atomic Company (GA) was retained to perform this independent review. The selection of GA was based on its technical qualifications, and financial independence from SCE.

On January 25, 1982, SCE transmitted to the NRC an Interim Report as received from GA, addressing their assessment of the San Onofre seismic design and quality assurance based on the completed portion of their review as defined in the Program Plan and amendments thereto.

On February 11 and 14, 1982, SCE transmitted supplemental information to the Interim Report. These three transmittals provided added assurance for issuance of the facility operating license for fuel load and low power testing.

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Director,
Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut

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There are seven Potential Finding Reports (PFR) issued against the total scope of work which were classified as Findings. One of them, PFR-0009 is design related on the "Globestrut" cable tray support. The remaining six, PFRs-0034, 0038, 0047, 0052, F015 and F051 are procedural. None of the Findings require plant design changes.

In accordance with our program procedures, SCE has issued Corrective Action Reports (CAR) against all of these PFRs, which have been processed under the established procedures and now are 'closed'. In addition, although not required by the program procedures, SCE issued CARs on all of the PFRs which were classified as "Observation". These CARs are presently being processed under SCE's normal procedures.

Enclosed are sixty-three (63) copies, each, of the three volume final report by GA titled, "Independent Verification of San Onofre Nuclear Generating Station Units 2&3 Seismic Design and Quality Assurance Program Effectiveness", as follows:

- Volume 1 - Executive Summary
- Volume 2 - Program Results
- Volume 3 - Two books of complete documentation on the Potential Finding Reports

As stated in previous correspondence, this program was designed to ensure independence. The program was managed with care to maintain this independence throughout and both the interim and final reports have now been transmitted to the NRC as received from GA.

The results of GA's independent review further strengthens our conclusion that San Onofre, Units 2 and 3, have been properly designed and constructed. Since fuel load of Unit 2 has been successfully completed and the post core activities are proceeding as planned, it is hereby requested that the NRC expedite review of this report in order to support timely issuance of the facility license for Full Power on San Onofre Unit 2.

Director,
Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut

April 5, 1982
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If you have any questions concerning this matter,
please contact me.

Very truly yours,



cc: NRC Region V, R. H. Engelken (w encl)
Licensing Branch #3, H. Rood (w encl-10)
E TECH, H. R. Fleck (w encl)



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A DIVISION OF GENERAL ATOMIC COMPANY

GEORGE L. WESSMAN

Director

April 5, 1982

Mr. D. J. Fogarty
Executive Vice President
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, CA 91770

Dear Mr. Fogarty:

The independent review of the seismic design for Southern California Edison's San Onofre Units 2 and 3, including an assessment of the effectiveness of the quality assurance program for design, has been completed and the final report has been issued.

For this program over 2100 documents were reviewed, some 33,000 checks of compliance with design control procedures were made, 22 features were technically reviewed, and over 177 manmonths of professional effort were expended.

The overall conclusion of the review is that the seismic aspects of San Onofre Units 2 and 3 project are adequate and no reason has been found to prohibit issuance of the full power license for Units 2 and 3.

A major part of the program was structured to verify that the design process adequately converted the seismic design bases specified in the Final Safety Analysis Report into design documents that were transmitted to the constructor or fabricator. All procedures used in the design process were reviewed to determine that the basic process was adequate. A selection of points was reviewed to ensure that the procedures were indeed implemented as they should have been. Finally, a selection of design documents, which are the products of the design process, was technically reviewed. These three activities, when taken together, have provided a discerning basis to judge the adequacy of the seismic design. The conclusion of this part of the program is that the seismic design of San Onofre Units 2 and 3 is adequate.

Two aspects of the construction process were reviewed. The first concluded that Southern California Edison and Bechtel Power Corporation did carry out an audit program that was properly planned and scheduled in accordance with their commitments and that this audit program was effective. The second concluded that the installation of the pipe segment reviewed was adequate with regard to the seismic requirements.

Although the program was structured to concentrate on Unit 2, Unit 3 review was included insofar as there are significant unique features. Based on this review the conclusions of this program are applicable to both units.

Those tasks which involved a review of procedures used the QA program documents and the PSAR commitments as the source of requirements. These requirements were interpreted and supplemented by 10CFR50 Appendix B and ANSI N45.2. Although a comprehensive review of the program using these documents as sources of requirements was not done, the current QA program was, in general, responsive to 10CFR 50 Appendix B and ANSI N45.2 and no deficiencies were noted.

Enclosed are twenty-one (21) copies of the final report. Fourteen additional copies of Volume 1 and nine additional copies of Volume 2 are enclosed. In addition, we have sent 75 copies to various offices in the Nuclear Regulatory Commission.

Sincerely,



G. L. Wessman
Project Manager

Enclosures

cc: J. Adrian