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SUBJECT: Clarities position re installation of inadequate core cooling instrumentation Status of instrumentation design const & startup schedule & proposed completion dates encl.

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October 28, 1982

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Director, Office of Nuclear Reactor Regulation
Attention: G. W. Knighton, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

Subject: Docket No. 50-362
San Onofre Nuclear Generating Station
Unit 3

- References:
- A. NUREG-0712, Supplement No. 1, February 1981,
Section 22.2, II.F.2
 - B. NUREG-0712, Supplement No. 4, January 1982,
Section 22.2, II.F.2
 - C. Summary of Meeting to Discuss Inadequate Core Cooling (ICC)
Instrumentation by Harry Rood, dated August 11, 1982
 - D. Letter; K. P. Baskin, SCE to Janis D. Kerrigan, NRC, dated
October 4, 1982
 - E. Letter; K. P. Baskin, SCE to Frank Miraglia, NRC, dated
May 13, 1982

The purpose of this letter is to clarify the position of Southern California Edison Company (SCE) with regard to the installation of ICC Instrumentation in San Onofre Nuclear Generating Station, Unit 3 (SONGS 3).

Reference C provided a summary of the status of the ICC Instrumentation design and the present construction and startup schedule for Unit 3. Reference D provided SCE's proposed completion dates for ICC Instrumentation for SONGS 3. All of the items [(19).o.1, (19).o.2, (19).o.3 and (19).o.5] are proposed for completion by fuel load of Unit 3 except the Safety Parameter Display System (SPDS) [(19).o.4], which is proposed for completion prior to startup following the first refueling outage.

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Mr. G. W. Knighton

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October 28, 1982

The SPDS function for SONGS 3 is achieved through two components: primary display is via the Critical Function Monitoring System (CFMS) and the seismically qualified backup display is via the Qualified Safety Parameter Display System (QSPDS). The equipment for the CFMS and QSPDS displays will be installed by fuel load of SONGS 3, and will display the variables associated with the ICC Instrumentation. This same equipment will be used to display both the SPDS variables and the Regulatory Guide 1.97 variables per Reference E. However, the SPDS and Regulatory Guide 1.97 inputs and associated software will not be implemented until first refueling of SONGS 3.

Table 1, enclosed, summarizes the presently scheduled implementation dates for the various functions to be achieved using the CFMS and QSPDS for both SONGS 2&3. As noted in Table 1 and previously indicated in the subject references, the ICC Instrumentation can be considered operational by fuel load for SONGS 3. However, the other functions of the system (SPDS and Regulatory Guide 1.97) to be achieved through additional inputs to the CFMS and the QSPDS will be implemented prior to startup following the first refueling outage.

If you have any questions concerning the above information, please call me.

Very truly yours,

K P Baslum

Enclosure

TABLE 1
 DISPLAY INSTRUMENTATION FOR ICC,
 SPDS AND R.G. 1.97 FUNCTIONS

	IMPLEMENTATION DATES	
	<u>SONGS 2</u>	<u>SONGS 3</u>
I. <u>CFMS</u> (primary display)		
A. NUREG 0737 Phase I*	Existing	Fuel load
B. ICC Instrumentation Phase II**	1st refueling	Fuel load
C. Additional SPDS and other inputs Phase III	1st refueling	1st refueling
D. R.G. 1.97 Phase IV***	1st refueling	1st refueling
II. <u>QSPDS</u> (safety grade backup display)		
A. ICC Instrumentation Phase II**	1st refueling	Fuel load
B. HJTC installed	1st refueling	Fuel load
C. HJTC operational	1st refueling	1st cycle verification and validation
D. Additional SPDS inputs	1st refueling	1st refueling
E. R.G. 1.97 Phase IV***	1st refueling	1st refueling

* NUREG 0737 item III.A.1 Phase I consists of 322 inputs to CFMS.

** Phase II is the inputs and software changes for: (a) SMM upgrade, (b) CETs upgrade and (c) RVLMS installed (verification and validation during 1st cycle).

*** Regulatory Guide 1.97 Phase IV is the additional inputs to the QSPDS and CFMS per Reference E.

SMM = Subcooled Margin Monitor

CETs = Core Exit Thermocouples

HJTC = Heated Junction Thermocouples

RVLMS = Reactor Vessel Level Monitoring System