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SUBJECT: Advises that proposed interim procedural change requiring vol control tank outlet valve to be placed in manual before resetting signal & commitment to modify logic consistent w/NRC Question 222.42 & SER Suppl 4.

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NOTES: J Hanchett 1cy PDR Documents. ELD Chandler 1cy. NRR Scaletti 1cy.

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## Southern California Edison Company



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K. P. BASKIN

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October 27, 1982

Director, Office of Nuclear Reactor Regulation
Attention: Mr. George 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

SCE's letter of October 4, 1982 provided an "Evaluation of San Onofre Unit 2 License Conditions Relative to Potential San Onofre Unit 3 License Conditions." Relative to License Condition No. (10) it was indicated in the letter that the Volume Control Tank (VCT) logic would be modified at the first refueling outage for Unit 3. The NRC staff requested additional clarification regarding the schedule for modification of the VCT logic.

SCE's response to IE Bulletin 80-06 (Engineered Safety Features Reset Controls) which was provided in Amendment No. 27 to the San Onofre Units 2 and 3 FSAR on November 17, 1981 provided the following response/commitment relative to the VCT outlet valve:

"SIAS causes the tank outlet valve to shut thus isolating the non-seismically designed VCT from the seismic Category I charging system. Low level in the VCT also closes this valve.

It has been determined that reopening of this valve upon SIAS reset is undesirable and consequently the following modifications are implemented:

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- Emergency procedures have been changed to incorporate a step to place this valve in the manual mode prior to resetting SIAS;
- The valve control logic will be modified at first refueling to insure that the valve does not change position following SIAS reset."

8211010180 821027 PDR ADDCK 05000362 Mr. George W. Knighton

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October 27, 1982

Even though the response did not specifically refer to Units 2 and 3, SCE intended to implement the VCT logic modification for Unit 2 during its first refueling outage and accordingly for Unit 3 during its first refueling outage.

Subsequently the NRC staff issued Supplement No. 4 to the San Onofre Units 2 and 3 Safety Evaluation Report (SER) on January 22, 1982 indicating that SCE's interim procedural change requiring the VCT outlet valve to be placed in the manual made prior to resetting the safety signal was acceptable until the logic could be modified at the first refueling outage.

The San Onofre Unit 3 procedures require the VCT outlet valve to be placed in the manual mode prior to resetting SIAS. SCE considers that this procedural requirement for Unit 3 along with the commitment to modify the logic at the first refueling outage for Unit 3 is consistent with both SCE's response to NRC question 222.42 and the NRC's position delineated in Supplement No. 4 of the San Onofre Units 2 and 3 SER.

If you have any questions or comments, please let me know.

Very truly yours,

WP Bushn