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 AUTH. NAME AUTHOR AFFILIATION
 BASKIN, K.P. Southern California Edison Co.
 RECIP. NAME RECIPIENT AFFILIATION
 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Summarize status of outstanding items in Tables 5-1 & 5-2 of environ qualification rept per NUREG-0588, Revision 2. All equipment except auxiliary feedwater pump motors meets guidelines.

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Southern California Edison Company



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

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

October 28, 1982

TELEPHONE
(213) 572-1401

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

The purpose of this letter is to summarize the status of the San Onofre Units 2 and 3 environmental qualification program. 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. In supplement 4 to the Safety Evaluation Report the staff concluded that the environmental qualification program and documentation meet the criteria of NUREG-0588 and Commission Memorandum and Order CLI-80-21, and are acceptable, subject to the following conditions:

1. The applicants confirm that their program for maintaining equipment qualification has been implemented;
2. The items identified in Tables 5-1 and 5-2 of the November 6, 1981 submittal shall be completed on the schedules defined in the tables. Justification for operation prior to completion of these items was reviewed by the staff and found acceptable.

SCE's letter of February 2, 1982 provided an updated status of outstanding items identified in Tables 5-1 and 5-2 of the November 6, 1981 submittal. Those items not closed were still on schedule.

On August 23, 1982 SCE submitted affirmation of the implementation of maintenance program procedures required by License Condition 2.C(5)c. This affirmation was accepted by the staff in the NRC's letter of August 30, 1982 from Mr. Thomas M. Novak to Mr. Robert Dietch, provided that replacement schedules for parts subject to age related degradation will be incorporated in the maintenance program by the first refueling outage or February 16, 1984, whichever comes first.

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Mr. George W. Knighton

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October 28, 1982

In response to the NRC request of October 7, 1982, 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. With the exception of the auxiliary feedwater pump motors all equipment which is required to meet NUREG-0588 guidelines for a Category II plant in a harsh environment is qualified.

Complete and auditable files documenting the qualification status for all equipment are available and maintained in a central location in the general office. In an effort to further enhance the environmental qualification program, SCE is in the process of placing each file into a standard format and entering the files into the corporate documentation system at San Onofre Nuclear Generating Station. The files are scheduled to be fully entered into the system by March 1, 1983.

The environmental qualification surveillance and maintenance program procedures are scheduled for full implementation by the first refueling outage which is consistent with the NRC's letter of August 30, 1982 and Unit 2 Operating License Condition 2.C(5)d.

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

Very truly yours,

KP Bushaw

Enclosure

STATUS OF OUTSTANDING ITEMS IDENTIFIED IN TABLE 5-1 AND
TABLE 5-2 OF THE "ENVIRONMENTAL QUALIFICATION REPORT PER
REQUIREMENTS OF NUREG-0588, REVISION 2"

All equipment except the auxiliary feedwater pump motors meets NUREG-0588 guidelines for a Category II plant (IEEE 323-1971 standard). However, some equipment will not be assigned a qualified life until additional testing has been completed. 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 (Items 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 are Category II plants, 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 Rosemount test program has been completed. A test report is due by January 1, 1983. Preliminary information indicates the 1153 Series D transmitters will be assigned a 20 year qualified life. The 1153 Series A transmitters currently installed at San Onofre Units 2 and 3 will be replaced with 1153 Series D transmitters during the first refueling outage of each unit.

The Foxboro E-10/NE-10 tests are completed. The test report is due by January 1, 1983. Preliminary information indicates the transmitters will be assigned a 20 year qualified life. Assuming the final report is issued in early 1983 the qualification files will be updated by June 1, 1983.

The GEMS test program is scheduled for completion by January 1, 1983. A qualified life will be assigned after receipt of the final test report in 1983. Should the transmitters fail the test, they will be replaced with a qualified transmitter during the first refueling outage of each unit.

2. Auxiliary Feedwater Pump Motors (Item A1 of Table 5-1)

The auxiliary feedwater pump motors containing replacement bearings made from cast iron were environmentally qualified for a harsh environment. Due to bearing failures in June, 1982 the cast iron bearings were replaced with the originally equipped babbitt bearings. Auxiliary feedwater pump motor environmental qualification will be addressed by separate correspondence by November 1, 1982.

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