

Central files

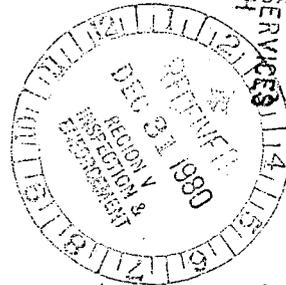
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INSPECTION SERVICES UNIT TELEPHONE (213) 572-1742

Southern California Edison Company

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ROSEMEAD, CALIFORNIA 91770  
December 26, 1980

J. G. HAYNES  
MANAGER OF NUCLEAR OPERATIONS



Rpt 80-09

Mr. R. H. Engelken  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Region V  
Suite 202, Walnut Creek Plaza  
1990 North California Boulevard  
Walnut Creek, California 94596

Dear Mr. Engelken:

DOCKET NO. 50-206  
SAN ONOFRE - UNIT 1

Our letter of May 13, 1980, forwarded to you our Corrective Actions regarding a notice of violation concerning the March 10, 1980 loss of salt water cooling incident at San Onofre Nuclear Generating Station, Unit 1.

Mr. Robert Pate, Resident Inspector, recently indicated that our May 13, 1980 response is inconsistent with the wording in Emergency Operating Instruction S01-3-5.34 as follows:

Our response states:

Corrective Actions which have been Taken

- 1.a.(2) Emphasis was placed on directing the operator to commence an immediate orderly shutdown of the unit in the event both the north and south salt water pumps are determined to be inoperable.

Emergency Operating Instruction States:

Immediate Operator Action

- 3.1 If both the salt water cooling pumps become inoperable.
  - 3.1.1 Unit shall be placed in at least hot shutdown within one (1) hour, and in at least cold shutdown within the following 30 hours unless corrective measures are completed that permit operation.

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We believe our response to your office in our May 13, 1980 letter and the implementation of that response in Emergency Operating Instruction S01-3-5.34 to be consistent for the following reason:

An "orderly shutdown" from full load requires approximately two hours. Thus, the requirement of S01-3-5.34 is more restrictive than our May 13 response to you.

Additionally, it is our understanding, based on a telephone conversation with Mr. Faulkenberry on April 9, 1980, that the region intended to use the Westinghouse Standard Technical Specifications as guidance in evaluating time constraints we specify in our emergency procedures. The time limit invoked in the Emergency Operating Instruction S01-3-5.34, "Loss of Salt Water to the Component Cooling System" is from the Westinghouse Standard Technical Specification.

It is not our intent, at anytime to prolong plant operations when such operations are outside a limiting condition for operation as specified in the Technical Specifications. We believe, however, that actions taken during emergency situations should proceed with thoughtfulness and due consideration for the conditions at hand.

For these reasons, we consider that the one hour time limit to be in hot shutdown is appropriate and consistent with our response to you in our May 13, 1980 letter.

We trust that this additional information clarifies our position on this matter, and we stand ready to further discuss the matter.

Very truly yours,

