

Southern California Edison Company



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KENNETH P. BASKIN  
VICE PRESIDENT

November 3, 1984

TELEPHONE  
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Director, Office of Nuclear Reactor Regulation  
Attention: D. M. Crutchfield  
Assistant Director for Safety Assessment  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206  
Approval for Plant Restart  
San Onofre Nuclear Generating Station  
Unit 1

By your letter dated October 19, 1984 it was indicated that additional information and findings were required before the staff could complete the Safety Evaluation Report for restart. This letter provides that additional information and findings and should enable the staff to complete their review.

Your letter addressed five areas requiring resolution. These are addressed as follows:

1. Request

Certification under oath and affirmation that the return to service plan is complete, including all required modifications, and is consistent with the December 23, 1983 program description, as modified by NRC comments.

Response

The return to service program, including all required modifications, established in our submittal dated December 23, 1983 and as modified by the NRC staff's comments including their February 8, 1984 Safety Evaluation Report has been completed.

2. Request

A determination that the seismically-induced failure of systems and components for which seismic reanalysis and upgrading have not been completed would not prevent structures, systems and components required to safely achieve a hot standby condition from performing their intended function.

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Response

An evaluation of the effects of failures of non-upgraded systems has been completed and is enclosed for your review. The conclusion of the evaluation is that seismically induced failures will not prevent the systems and components necessary to achieve a safe hot standby condition from performing their intended function.

3. Request

Confirmation that the as-built configuration of the masonry walls is consistent with the conditions assumed in their seismic capability analyses and tests. This issue was discussed during the site meeting on masonry walls in September 1984.

Response

Information relating to this subject was submitted by letter from M. O. Medford, SCE, to J. A. Zwolinski, NRC, dated October 27, 1984. The conclusions of that submittal are that the masonry walls are built in accordance with the construction specifications and the design drawings upon which the analysis and tests were based.

4. Request

Confirmation that all analyses for the return to service plan have complete quality control certification. In particular, verification that the analysis for support SI-01-5011-H008 has properly considered all loads on the beam. This question was raised during the staff's audit review of analysis calculations.

Response

In telephone conferences with members of the NRC staff and their consultants on October 15 and 18, 1984 this issue was discussed. It was indicated that the calculation reviewed by the NRC staff's consultant did not correspond to the as-built configuration due to a field change in the piping support. This field change was later included in the calculation. The performance of this change was in accordance with standard SCE and Bechtel Power Corporation practices. All piping analyses for the return-to-service program have followed the appropriate quality assurance procedures and have complete quality control approvals.

5. Request

Presentation of a deterministic basis for concluding that the "return to service" scope is adequate to ensure public safety for plant restart. Your presentation should also address the time period for which hot standby can be maintained and possible contingency measures that are being considered for longer-term cooling should it be required.



Response

By letter from Kenneth P. Baskin, SCE, to H. R. Denton, NRC, dated October 17, 1984 copies of presentations made to the NRC were submitted. One of those presentations was a deterministic justification for San Onofre Unit 1 restart. That presentation provides details of the plant response to a 0.67g Housner seismic event and concludes that the unit can be safely shutdown and maintained in a safe condition for an indefinite period.

Your letter also states that exemption requests or requests for license amendments may also be required for any design or operational aspects of the plant which are not in conformance with applicable NRC regulations or the operating license. Since the current outage began in February 1982, there have been two orders issued concerning San Onofre Unit 1 and no new requirements imposed by regulations. Of the two orders, one was issued to confirm the schedule for TMI modifications and the other concerns the seismic upgrade program. These orders were addressed in our letters dated September 20, 1984 and August 30, 1984, respectively. Since there have been no changes to the plant that would cause it to be in non-conformance with the requirements of applicable NRC regulations or the operating license, no further licensing actions are required.

The above information is provided in order that the NRC staff may complete their review of the return-to-service status such that restart may be authorized. Please contact me if you have any questions or require additional information.

Subscribed on this 3<sup>rd</sup> day of November, 1984.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Kenneth P. Baskin  
K. P. Baskin  
Vice President

Subscribed and sworn to before me this  
3<sup>rd</sup> day of November, 1984.

C. Sally Sebo  
Notary Public in and for the County of  
Los Angeles, State of California

My Commission Expires: April 14, 1986

