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November 14, 1984

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Director, Office of Nuclear Reactor Regulation
Attention: J. A. Zowlinski, Chief
Operating Reactors Branch No. 5
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206
SEP Topic II-1.C, Offsite Hazards
NUREG-0737, Item III.D.3.4, Control Room Habitability
San Onofre Nuclear Generating Station
Unit 1

- References: 1. Letter, M. O. Medford, SCE, to D. M. Crutchfield, NRC,
Systematic Evaluation Program Integrated Assessment,
February 24, 1984
2. Letter, D. M. Crutchfield, NRC, to R. Dietch, SCE, Order
Confirming Licensee Commitments on Post-TMI Related Issues
(Generic Letters 82-05 and 82-10), March 14, 1983

Reference 1 provided our schedule to perform a risk assessment of possible control room HVAC upgrades in order to resolve the subject SEP topic. The assessment is also part of our response to the subject NUREG-0737 requirement, as required by Reference 2. To this end, this letter provides the results of our assessment and our plans to determine the final upgrades to the San Onofre Unit 1 control room HVAC and habitability systems.

A risk assessment of the loss of control room habitability (enclosed) has been performed for the San Onofre Unit 1 control room. This assessment demonstrates that, utilizing the NRC's benefit criteria for risk reduction, the value/safety impact analysis results in the conclusion that no modifications to the current control room HVAC and habitability systems are appropriate. This assessment is based upon the determination that the failure of the control room HVAC system, coincident with a radiological event or offsite accident that would create a hazard to the control room operations crew, is very low.

Notwithstanding this risk assessment, we will perform a review of upgrades that can reasonably be implemented to enhance the reliability of the control room HVAC. This review will be completed on a one to two month

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schedule and it is anticipated that the results will be ready for discussion with members of the NRC staff during the Integrated Assessment. Based upon that discussion agreement on the final upgrade plan will be reached.

If you have any questions, please let me know.

Very truly yours,

M. D. Medford

Enclosure