

Southern California Edison Company



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

M. O. MEDFORD  
MANAGER, NUCLEAR LICENSING

March 15, 1985

TELEPHONE  
(818) 302-1749

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

Gentlemen:

Subject: Docket No. 50-206  
Environmental Qualification  
San Onofre Nuclear Generating Station  
Unit 1

As part of the Environmental Qualification Program for San Onofre Unit 1, we have been developing the qualification packages for that equipment which is considered qualifiable. As indicated in our February 26, 1985 letter to the NRC, the packages will be completed by March 31, 1985, the 10 CFR 50.49 environmental qualification deadline. All the remaining equipment which can not presently be shown qualifiable will be replaced or qualified by the November 30, 1985 extension deadline or the plant will be shutdown.

The purpose of this letter is to identify additional items in the environmental qualification program which will require an extension in accordance with 10 CFR 50.49(g). As a result of obtaining the qualification documentation for these items, it was determined that due to extenuating circumstances, additional time would be required to complete the documentation packages. Details regarding the circumstances are provided below.

The feedwater pumps at San Onofre Unit 1 are utilized for feedwater and safety injection service. These pumps are driven by Westinghouse motors. In our efforts to complete the qualification of the motors, Westinghouse has been unable to identify a test report which applies to the pump motors. Westinghouse can correlate the materials of the motors to the materials of motors which have been tested. Such a correlation can be used as a basis for qualification of the feedwater pump motors. The Westinghouse schedule for completing this work is estimated at 6 months which is approximately September, 1985. Depending on the results of the Westinghouse work it will take two to eight weeks to develop a qualification documentation package for the Westinghouse motors. Therefore an extension of the qualification deadline of the motors to November 30, 1985 is requested.

Paul Munroe actuators are installed on valves in the Containment Isolation System, Containment Spray System and the Recirculation System. The test report which is being utilized as the basis for qualification of the actuators is for a similar Paul Munroe actuator. It has been determined that the test reports do not directly apply to the actuators designed and installed at San Onofre Unit 1. Paul Munroe is developing a correlation for the

8503190429 850315  
PDR ADDCK 05000206  
PDR

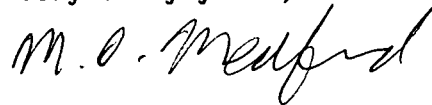
AOA  
1/1

similarity between the installed actuators and the tested actuator such that the test report will also apply to the installed actuators. The schedule for completion of this effort is the end of March 1985. Depending on the results of the correlation it will then take two to eight weeks to develop the qualification documentaion package for the Paul Munroe actuators. It is therefore anticipated that following the completion of the Paul Munroe correlation the qualification package for the Paul Munroe actuators will be developed and completed prior to November 30, 1985. However, an extension to November 30, 1985 is requested in view of the uncertainty associated with the qualification documentation and to maintain consistency.

In both of the above cases, the justifications for continued operation have been reviewed and modified as necessary. These justifications have been developed in accordance with 10 CFR 50.49(i) and are provided here as an enclosure. They were previously provided to the NRC staff by letter dated November 3, 1984.

If you have any questions regarding this matter, please let me know.

Very truly yours,



Enclosures

cc: F. R. Huey

Plant Tag No.: G3A,B  
Functional Name: Pump Motors  
Manufacturer: Westinghouse  
Model Number: CS Type

Functional Description:

These motors service the feedwater pumps and are located outside the containment, under the turbine building on opposite sides of the building. The pumps are utilized in the safety injection system to provide borated water to the reactor vessel.

Qualification Status:

Qualified, documentation evaluation is in progress.

Justification for Continued Operation:

Westinghouse motors containing similar materials have been tested under simulated accident conditions. Westinghouse will be developing the correlation between the motors materials and the motors tested by Westinghouse with similar materials. These motors are located outside containment (Areas 5, 6) and it is anticipated that all required accident conditions will be enveloped by testing. These components will be considered fully qualified when formal documentation of the plant specific evaluation is completed. Documentation is scheduled to be completed prior to November 30, 1985.

Until the documentation is completed for the motors, in the event of a high energy line break in the vicinity of one of the motors, the environment will not affect the other motor. This is due to the fact the motors are located on opposite ends of the turbine building. The ECCS analysis for the plant relies on one feedwater pump operating therefore, the ability to provide core cooling is not affected.

This JCO complies with the criteria set forth in 10 CFR 50.49(i)(2) and (5) and ensures that SONGS 1 can be safely operated pending qualification of the pump motors.

Plant Tag No.: CV515, 516, 517, 518, 525, 526, 527, 528, 737A, 737B  
Functional Name: Hydraulic Rotary Valve Operators  
Manufacturer: Paul Munroe  
Model Number: PD89423, PD89425, PD89426

Functional Description:

These valve operators are located inside and outside containment on valves in systems which require operation following an accident.

Qualification Status:

Qualified, documentation evaluation is in progress.

Justification for Continued Operation:

Paul Munroe qualification test report No. PA87604 has been provided by the vendor as applicable to the installed valve operators. Paul Munroe is developing a correlation between the tested valve operators and the installed operators. The test sequence includes normal thermal aging and operating degradation in excess of requirements, based on the manufacturers recommended minimum maintenance schedules. The test documents a gamma radiation accident exposure of  $8.7 \times 10^7$  Rads following a minimum normal operation exposure of  $1.25 \times 10^7$  Rads. LOCA testing provides a peak temperature and pressure of 350°F and 66 psig, and dwell times that exceed the postulated accident requirements including margins. During LOCA testing, the test specimens were exposed to a chemical spray solution of pH 9.5 which is more severe than the required condition. Functional testing conducted throughout each sequence of the testing provides assurance of operability. These components will be considered fully qualified when formal documentation of the plant specific evaluation is completed. Documentation is scheduled to be completed prior to November 30, 1985.

This JCO complies with the criteria set forth in 10CFR50.49(i)(2) and ensures that SONGS-1 can be safely operated pending completion of the qualification documentation.