

Southern California Edison Company



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March 19, 1985

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Director, Office 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
Steam Generator Inspections
San Onofre Nuclear Generating Station
Unit 1

Reference: Letter, D. M. Crutchfield, NRC, to K. P. Baskin, SCE, Steam
Generator Inspection, February 7, 1984

In accordance with Provisional Operating License No. DPR-13, Condition 3.E, Steam Generator Inspections, we are currently required to shutdown San Onofre Unit 1 for an interim steam generator inspection within 6 Equivalent Full Power Months (EFPM) of the outage that ended on November 27, 1984. The referenced letter indicated that the NRC staff would evaluate any additional justification for extension of the steam generator inspection interval. In response to that statement, we met with members of the NRC staff on February 27 and March 14, 1985 to present our justification for extension of the inspection interval. In the meetings, we indicated that a more appropriate degradation rate, based upon a recent re-evaluation of historical eddy current data, justifies a return to a refueling outage interval, approximately 15 EFPM, for the inspection of the non-sleeved steam generator tubes at San Onofre Unit 1. Enclosed for your review is the report "1985 Re-evaluation of Steam Generator Inspection Interval, San Onofre Unit 1." The report details the results of the eddy current data re-evaluation and provides the basis for establishing a revised, more appropriate degradation rate for the non-sleeved tubes. It is this revised degradation rate which provides the basis for a return to a refueling outage interval for steam generator inspections.

We plan to submit an application to amend to Provisional Operating License No. DPR-13 to revise Condition 3.E, Steam Generator Inspections. This application will be submitted to you by April 10, 1985. The amendment, supported by the information in the enclosed report, will propose deleting the existing condition which requires an interim steam generator inspection 6 EFPM from the outage that ended on November 27, 1984.

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March 19, 1985

Pursuant to 10 CFR 170.12 as revised in 49 FR 21293 dated May 21, 1984, the review of this enclosed report, submitted to support a future license amendment application, is determined to require a fee of \$150.00. Accordingly, SCE's check in the amount of \$150.00 to cover the fees is enclosed as required by 10 CFR 170.12.

In addition, based on the information in the enclosed report, it is our intention to revise our current repair commitment for non-sleeved tubes which states that we will plug any rotating pancake coil (RPC)-detectable IGA indications at the top of the tubesheet. The effort to revise this commitment prior to the 1985 refueling outage will be the subject of future discussions with the NRC staff.

If you have any questions regarding the enclosed report, please let me know.

Very truly yours,



Enclosure

cc: J. B. Martin, Regional Administrator, Region V
F. R. Huey, USNRC Senior Resident Inspector, Units 1, 2 and 3