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April 12, 1985

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  
NUREG-0737, Item I.C.1 - Emergency Operating Procedures  
San Onofre Nuclear Generating Station  
Unit 1

Reference: Letter, K. P. Baskin, SCE, to D. M. Crutchfield, NRC, Post-TMI  
Requirements, February 16, 1983

The referenced letter provided you with our last schedule for the completion of the subject requirements. This schedule was revised to be prior to return to power from the 1982-84 backfit outage as part of the schedule agreed upon by SCE and the NRC staff during April 1984. However, since expending the resources for the completion of a procedures generation package (PGP) would impact the completion of the Emergency Operating Instruction (EOI) Upgrade Program, the schedule for submitting the PGP was deferred, in a conversation with Mr. J. Lyons of your staff, until after return to power from the outage that ended on November 27, 1984. It is the purpose of this correspondence to provide, as an enclosure, the procedures generation package required by Supplement 1 to NUREG-0737 - Requirements for Emergency Response Capability (Generic Letter No. 82-33).

The San Onofre Unit 1 EOI's are based upon the Westinghouse Owner's Group Emergency Response Guidelines; therefore, the procedures generation package contains the following elements:

- o Overview and Technical Guidelines Discussion
- o San Onofre Unit 1 Emergency Operating Instruction Writers Guide
- o San Onofre Unit 1 Validation Program Description
- o San Onofre Unit 1 Emergency Operating Instruction Training Program Description

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Mr. J. A. Zwolinski

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The enclosed PGP states on page A-5 that the upgraded EOI's were originally issued during 1983. In order to clarify our intentions regarding this early issuance of the EOI's, the following discussion is offered. Due to the work slowdown at San Onofre Unit 1 during the summer of 1983, the EOI's were issued and the operators trained, even though the EOI's still had some unresolved issues and would have to be revised prior to restart to incorporate some planned modifications. The early issuance of the EOI's was considered prudent in view of the improvement over the existing EOI's, the cold shutdown status of the plant and the opportunity for long term operator training on a set of EOI's that was very close to the final version. Therefore, the procedures underwent a final revision just prior to return to power in an effort to incorporate plant design changes implemented during the outage, incorporate formal simulator validation and operator feedback, incorporate Westinghouse comments and to resolve any remaining open issues.

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

Very truly yours,

*M. D. Medford*

Enclosures