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July 24, 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
Additional Information Relating to Generic Letter 83-28
San Onofre Nuclear Generating Station
Unit 1

Reference: April 22, 1985 letter from J. A. Zwolinski, NRC, to K. P. Baskin,
SCE, regarding Generic Letter 83-28

The referenced letter requested additional information relative to
our initial response to Generic Letter 83-28, Items 3.1.1, 3.1.2, 3.2.1 and
3.2.2. The requested information is provided as an enclosure to this letter.

If you have any questions or desire additional information, please
let me know.

Very truly yours,

M. O. Medford

Enclosure

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RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
RELATING TO GENERIC LETTER 83-28
SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 1
DOCKET NO. 50-206

1. Information Request for Item 3.1.1

Position 3.1.1 of Generic Letter 83-28 (GL 83-28) states that licensee reviews should "...assure that post-maintenance operability testing of safety-related components in the reactor trip system is required to be conducted and that the testing demonstrates that the equipment is capable of performing its safety function before being returned to service" (underlining added). Your response to this item (SCE letter dated November 28, 1983), indicates this guidance is met for the reactor trip breakers. For other safety-related components in the reactor trip system, however, your response is less definitive. For example, you indicate an inter-disciplinary review is utilized to determine the minimum test requirements. From this statement, it would appear that in some cases testing might not be required. Also it is not clear that 'minimum' test requirements would necessarily be the same as those required to assure the capability to perform the intended safety function.

Based on the foregoing, please address the following:

- a. Please state whether all safety-related components in the reactor trip system will be required to be tested following maintenance.
- b. If testing will be waived in some instances, please describe and justify the criteria to be used in granting such waivers.
- c. Please state whether the minimum post-maintenance testing will be sufficient to demonstrate the equipment is capable of performing its safety function before being returned to service.

Response

In our original response to this item dated November 28, 1983, it was reported that each maintenance work order, for safety-related reactor trip system components (excluding reactor trip breakers), received an interdisciplinary review performed by a Retest Committee. Based on this review, the Retest Committee established the minimum post-maintenance operability testing required. This program provided assurance that reactor trip system components are capable of performing their safety function before being returned to service. Subsequent to this, a more definitive program for specifying post-maintenance testing has been developed which obviates the need for an interdisciplinary review performed by a Retest Committee. Under this program, the Post-Maintenance Retest Program (PMRP), the requirements for post-maintenance testing on safety related equipment are specified.

The PMRP is based on the philosophy that after repair, replacement, or adjustment to any safety-related equipment, testing must be performed to demonstrate that the affected equipment is capable of performing its design function. All safety-related equipment in the reactor trip system is tested following maintenance activity per the PMRP. At the minimum, this post-maintenance testing demonstrates that the equipment operates per design documents and is capable of performing its safety function.

2. Information Request for Item 3.1.2

Position 3.1.2 of GL 83-28 states that licensees should submit the results of their checks of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications, where required. Your response of November 28, 1983, describes how station test and maintenance procedures have been developed, but does not describe the results of the check of vendor and engineering recommendations that was performed in response to this request. Please submit the results of your check of this documentation, and describe the corrective action that has been taken, if any. Please note that this check should cover all components of the Reactor Trip System - not just the trip circuit breakers.

Response

A comprehensive Preventive Maintenance Project has recently been completed (December 1984) at San Onofre Unit 1. Part of this project included a review of vendor and engineering recommendations to assure their incorporation into maintenance procedures. This review covered reactor trip system components, as well as, all other safety-related components. Test and maintenance activities have been revised based on the results of this review.

In addition to this recently completed review, all maintenance procedures incorporating safety-related components undergo a biennial review. During the biennial review, vendor and engineering recommendations are checked, assuring their incorporation into maintenance procedures.

3. Information Request for Item 3.2.1

Position 3.2.1 of GL 83-28 states that licensees should "...assure that post-maintenance and operability testing of all safety-related equipment is required to be conducted and that the testing demonstrates that the equipment is capable of performing its safety functions before being returned to service" (underlining added). As with Position 3.1.1, your response leaves open the possibility that some components may not be required to be tested and addresses testing in terms of 'minimum requirements' rather than assuring the capability to perform required safety functions. Accordingly, for the components covered by Position 3.2.1, please respond to Items a, b, and c listed under Question 1, above.

Response

As described in the above response to Item 3.1.1, the PMRP specifies the requirements for post-maintenance testing on all safety related equipment including RTS components. Based on the PMRP, after the repair, replacement, or adjustment to any safety-related component, post-maintenance testing is performed. At the minimum, this post-maintenance testing demonstrates the equipment operates per design documents and is capable of performing its safety function.

4. Information Request for Item 3.2.2

Position 3.2.2 of GL 83-28 states that licensees should submit the results of their checks of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications, where required. Your response of November 28, 1983, describes how station test and maintenance procedures have been developed, but does not describe the results of the check of vendor and engineering recommendations that was performed in response to this request. Please submit the results of your check of this documentation, and describe the corrective action that has been taken, if any.

Response

As described in the above response to Item 3.1.2, a review of vendor and engineering recommendations to assure their incorporation into maintenance procedures has recently been completed (December 1984) at San Onofre Unit 1. This review constituted part of a comprehensive Preventive Maintenance Project covering all safety related components. Based on the results of this review, test and maintenance activities have been revised.

In addition to this recently completed review, all maintenance procedures incorporating safety-related components undergo a biennial review. During the biennial review, vendor and engineering recommendations are checked, assuring their incorporation into maintenance procedures.