

Southern California Edison Company



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July 31, 1985

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Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-206, 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 1, 2 and 3

The Southern California Edison Company's (SCE) letter dated March 20, 1985 requested an exemption to part of 10 CFR 20 to allow credit for an iodine protection factor when using the MSA GMR-I canister in atmospheres containing radioiodine. SCE responded to NRC staff question's regarding this exemption request in our July 11, 1985 submittal. Clarification of our response to Question 471.4, relating to quality assurance for the MSA GMR-I canisters was requested.

SCE will verify that the MSA GMR-I canisters will meet the standards for quality assurance and quality control which are recognized by NIOSH (i.e. Mil-STD 414). Specifically this includes a 1% AQL (Acceptable Quality Limit) in a 5 to 10 ppm challenge concentration of CH_3I , 90% relative humidity, 110°F, 64 LPM cyclic flow, for a service life of 8 hours or more at a penetration equal to 1% of the challenge concentration. Prior to NIOSH certification of MSA GMR-I canisters this verification will be made through SCE's acceptance and periodic review of the MSA QA controls for the GMR-I canisters. For canisters previously purchased by SCE, prior to taking credit for an iodine protection factor, SCE will verify that the MSA QA controls acceptable to SCE were applied to these canisters. Otherwise SCE will purchase new canisters subject to the acceptable MSA QA controls.

If you have any additional questions regarding our exemption request, please call me.

Very truly yours,

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cc: Mr. J. A. Zwolinski, Branch Chief, Operating Reactors Branch No. 5
Mr. R. Dudley, NRR Project Manager, San Onofre Unit 1
Mr. H. Rood, NRC (to be opened by addressee only)
Mr. F. R. Huey, Senior Resident Inspector, SONGS
Mr. J. B. Martin, Regional Administrator, Region V

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