

Southern California Edison Company



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

M. O. MEDFORD
MANAGER, NUCLEAR LICENSING

October 4, 1985

TELEPHONE
(818) 302-1749

Director, Office of Nuclear Reactor Regulation
Attention: Mr. 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
Fire Protection Program Review
San Onofre Nuclear Generating Station
Unit 1

By letter dated May 21, 1985 information was provided to supplement our submittal of April 24, 1984 regarding a conceptual design for a dedicated shutdown system (DSS) to be used as part of our compliance with Section III.G of Appendix R to 10 CFR 50. Since that time we have proceeded with the III.G compliance review and detailed engineering of the DSS. These efforts have reached a state where a submittal can be provided relating to the information required in the clarified Generic Letter 81-12 (GL81-12) which was transmitted to SCE by letter dated May 10, 1982. The purpose of this letter is to submit the GL81-12 information and the associated exemption requests.

Accordingly, enclosed are 5 copies of the report entitled, "Southern California Edison, San Onofre Nuclear Generating Station Unit 1, Generic Letter 81-12 Response," (81-12 report) which provides the NRC required information regarding the use of alternative and dedicated shutdown systems. Enclosure 1 to the 81-12 report is entitled, "San Onofre Nuclear Generating Station Unit 1, 10 CFR 50, Appendix R, Section III.G, Compliance Evaluation," and provides the III.G compliance review for all areas of the station (including normal shutdown areas). Enclosure 1 is provided since the 81-12 report references the document in responding to specific questions. In addition, Enclosure 2 to the 81-12 report provides a design description of the DSS which includes the detailed engineering information required in GL81-12. Finally, Enclosure 3 provides the III.G exemption requests which are associated with Appendix R compliance.

It should be noted that the Appendix R compliance efforts are now in progress. This submittal includes information based on work that has not been completed. A submittal with updated information will therefore be provided in the future. In order to maintain a record of the additional information to be submitted, a list is provided below. This additional information will include:

*Revised
Dist* *A006
11* *For San
advanced
Review Copy*

8510090007 851004
PDR ADOCK 05000206
F PDR

October 4, 1985

1. Revision to the III.G compliance review when field walkdowns are completed on a few circuits for which documentation was insufficient to support analysis.
2. Revision to the III.G compliance review when we address the associated circuit issue relating to the high impedance fault analysis for 120 volt AC electrical systems.
3. Revision to the III.G compliance review when the ongoing evaluation of the spurious operation of the charging pump suction valves is completed.
4. Revision to the III.G compliance review and the DSS design description when final engineering is completed.
5. Submittal of the additional information committed to be provided in the GL81-12 report.
6. Additional exemptions which may need to be prepared as a result of the above identified efforts or completion of the ongoing engineering.
7. A deviation (not an exemption) for NRC review and approval regarding the use of more than one operator action in the control room.

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

Very truly yours,

M. E. Medford

Enclosures