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October 8, 1985

M. O. MEDFORD MANAGER, NUCLEAR LICENSING TELEPHONE (818) 302-1749

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 II.F.2 - Inadequate Core Cooling (ICC) Instrumentation San Onofre Nuclear Generating Station Unit 1
- References: 1. Letter, K. P. Baskin, SCE, to D. G. Eisenhut, NRC, Inadequate Core Cooling Instrumentation, February 10, 1983
 - Letter, D. G. Eisenhut, NRC, to All Licensees of Operating Westinghouse and CE PWRs, Inadequate Core Cooling Instrumentation System (Generic Letter No. 82-28), December 10, 1982
 - 3. Letter, K. P. Baskin, SCE, to H. R. Denton, NRC, Integrated Living Schedule, February 27, 1984

Reference 1 provided SCE's initial response to the requirements of Reference 2 by stating that we would advise you of our schedule to provide the requested information when our return to service plans were established and approved. Accordingly, Reference 3 provided you with a revised Integrated Living Schedule (ILS), including the schedule for the evaluation requested by Reference 2, for your review. The ILS was accepted by your letter of March 29, 1984. It is the purpose of this letter to provide you with a detailed description of our plans and schedule to provide the information requested by Reference 2.

The ILS schedules the evaluation of our current ICC instrumentation capabilities as part of the Cycle 9 refueling outage effort. Specifically, we plan on a submittal to you by March 1, 1986. The submittal will provide you with an assessment of our current ICC instrumentation capability, our plans for any required upgrades to the existing instrumentation and a justification for relief from the requirement to install a reactor vessel level measurement system. The justification will be based upon unique plant design, plant response to transients and offsite dose considerations.

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Mr. J. A. Zwolinski

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In the interim we will rely on our subcooling margin monitoring equipment, installed in response to post-TMI requirements, for ICC monitoring capability. In addition, we also have core-exit thermocouples, hot and cold leg RTD's, and pressurizer pressure monitoring capability. This redundant and diverse monitoring instrumentation, when utilized in conjunction with the upgraded Emergency Operating Instructions (EOI's), will assure the capability to diagnose the approach to, condition of, and recovery from an ICC event at San Onofre Unit 1.

If you have any questions regarding our plans or schedule, please let me know.

Very truly yours,

m. O. Medford

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