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December 16, 1985

Director, Office of Nuclear Reactor Regulation
Attention: Mr. G. E. Lear, Director
PWR Project Directorate No. 1
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206
Regulatory Guide 1.97 Review
San Onofre Nuclear Generating Station
Unit 1

Reference: Letter, M. O. Medford, SCE, to H. L. Thompson, Jr., NRC, Supplement 1 to NUREG-0737, Requirements for Emergency Response Capability, (Generic Letter No. 82-33), April 23, 1985

In accordance with the schedule of the referenced letter, enclosed please find the report entitled, "San Onfore Nuclear Generating Station Unit 1 Regulatory Guide 1.97 Review" dated December 1985. This report provides Southern California Edison's evaluation of the degree of conformance of the San Onofre Unit 1 post-accident monitoring instrumentation to the guidance contained in Regulatory Guide 1.97, Revision 2. It describes the development of the plant-specific variables necessary to monitor the plant and environmental conditions during and following an accident at San Onofre Unit 1. Post-accident monitoring instrumentation to monitor the plant-specific variables provides operators with the information required to safely shut down the plant and monitor radioactive releases.

The enclosed report identifies certain areas in which existing instrumentation used to monitor plant-specific variables does not fully conform to the design and qualification guidelines specified in Regulatory Guide 1.97. For the majority of these areas, justification for the deviation is provided. For the remaining deviations, plant upgrades are provided as recommendations to resolve the identified deficiencies. In accordance with the schedule provided with the referenced letter, final resolution of these recommendations will be provided by May 1987. The enclosed report including recommendations will be used as input to the remaining Supplement 1 programs and evaluated to determine the most efficient use of resources to comply with our Supplement 1 related backfit commitments.

It is noted that the design and qualification status of the instrumentation used to evaluate the degree of conformance of the plant-specific variables was derived from the best available instrumentation (i.e., the instruments which conform to the Regulatory Guide 1.97 design

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requirements). If the subsequent phases of our response to Supplement 1 initiatives recommend alternate instrumentation be used to monitor any of the plant-specific variables noted in the enclosed report, the alternate instruments will be evaluated against the Regulatory Guide 1.97 design and qualification requirements. These evaluations, if necessary, will be performed in accordance with the methodology used in the enclosed report.

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

Very truly yours

M. O. Medford

Enclosure