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March 10, 1986

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

Gentlemen:

Subject: Docket No. 50-206  
License Condition 3.E Steam Generator Inspection Report  
San Onofre Nuclear Generating Station  
Unit 1

- References:
1. Letter, J. A. Zwolinski, NRC, to Kenneth P. Baskin, SCE, Steam Generator Inspection Schedule, June 5, 1985
  2. Letter, M. O. Medford, SCE, to J. A. Zwolinski, NRC, Steam Generator Tube Inspections, July 5, 1985
  3. Letter, M. O. Medford, SCE to J. A. Zwolinski, NRC, Steam Generator Inspections, March 19, 1985
  4. Letter, M. O. Medford, SCE, to Reba M. Diggs, NRC, Steam Generator Inspection Program Review, October 4, 1985

Reference 1 revised License Condition 3.E, Steam Generator Inspections, of Provisional Operating License No. DPR-13 to require that SCE provide the NRC with a plan for an inspection of the San Onofre Unit 1 steam generators during the refueling outage scheduled to begin no later than November 30, 1985, and, based upon the inspection results, request Commission approval of resumption of power operation following the inspection. Reference 2 provided SCE's plan to inspect the steam generators in accordance with License Condition 3.E, Steam Generator Inspections. This correspondence provides as an enclosure a report of the steam generator inspection results entitled "1985 License Condition 3.E Steam Generator Inspection" for your review. It is respectfully requested that you promptly complete your review of the enclosed report and approve resumption of power operations as it relates to the inspection of the steam generators.

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March 10, 1986

The enclosed report documents the results of the steam generator inspection performed in accordance with the plan provided to you by Reference 2. These results indicate that there has been no detectable progression of intergranular attack (IGA). Accordingly, it is determined that the conclusions of our report entitled "1985 Re-evaluation of the Steam Generator Inspection Interval", transmitted by Reference 3, were adequately conservative and it is appropriate that we inspect the San Onofre Unit 1 steam generators at refueling outage intervals. Further, for future steam generator inspections, the requirements of Technical Specification 4.16.A.1 will provide adequate assurance of the condition of the non-sleeved tubes as part of our overall Technical Specification inspection.

The enclosed report also discusses SCE's current commitment regarding the special plugging criteria for the non-sleeved tubes and provides justification for a revision of this commitment. The current non-sleeved tube plugging criteria commitment was based upon uncertainty in the ability of eddy current techniques to detect IGA as found at San Onofre Unit 1. However, as demonstrated in the March 1985 report (Reference 3) and as further confirmed in the enclosed report, eddy current testing and analytical techniques and our understanding of the conditions in the San Onofre Unit 1 steam generators have advanced such that we are confident in our ability to accurately detect and quantify IGA. Therefore, it is appropriate that the use of special plugging criteria be discontinued and in the future we use the acceptance criteria defined in Technical Specification 4.16.E.1.C.

The enclosed report is subject to the fee provisions of 10CFR 170.12(c), which require that we remit a fee of \$150.00. However, Reference 4 provided you with the appropriate fee to cover the NRC review of the enclosed report and therefore, no fee is remitted with this letter.

If you have any questions regarding the above discussed information or the enclosed report, please let me know.

Sincerely,



Enclosure

cc: F. R. Huey, USNRC Senior Resident Inspector, San Onofre Units 1, 2 and 3  
J. B. Martin, Regional Administrator, NRC Region V