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June 25, 1986

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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
Additional Information Supporting Amendment Application No. 132
San Onofre Nuclear Generating Station
Unit 1

Reference: Letter, Robert Dietch, SCE, to H. R. Denton, NRC, dated
November 20, 1985

Enclosed with the referenced letter was SCE's Amendment Application No. 132. That amendment proposed changes to Technical Specifications (T.S.) 4.2.3, "Safety Injection Hydraulic Valve Testing," and 4.2.1, "Safety Injection and Containment Spray System Periodic Testing." The changes would eliminate the interim T.S. 4.2.3 requiring plant shutdown every 92 days and replace it with a specification on the acceptable valve actuation times for the hydraulically actuated valves in T.S. 4.2.1.

As a result of discussions with members of the NRC staff, we have contracted an independent party to review the results of the interim testing and the proposed modifications to the T.S. In particular, it was requested that the differences between a full flow "hot" SIS test, and a no flow "cold" test be evaluated. Enclosure 1 provides this consultant's report for your review. The conclusions of the report are that the root causes of the previous valve failures have been eliminated and that the proposed test is adequate for long term surveillance.

The report additionally recommends that particular attention be given to verification of successful operation of the HV-851 body relief solenoid valves, SV-2900 and SV-3900. Under the interim program, successful operation of these valves was verified. It will continue to be verified in future HV-851 testing. It should also be noted that these valves are being included in the Inservice Testing Program as requiring a quarterly full stroke test.

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Mr. G. E. Lear

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Enclosure 2 includes responses to several additional questions discussed with members of the NRC staff. These questions concern other aspects of system operation and testing not necessarily directly connected with the HV-851 valves.

If you have any questions, please let me know.

Very truly yours,



Enclosures

cc: F. R. Huey, USNRC Resident Inspector, Units 1, 2 and 3
J. B. Martin, NRC Region V, Regional Administrator
J. O. Ward, California Department of Health Services