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July 11, 1986

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

Gentlemen:

Subject: Docket No. 50-206
TMI Action Plan Item II.K.3.30 and 31
Small Break LOCA Methods
San Onofre Nuclear Generating Station, Unit 1

- References:
1. NRC Generic Letter 83-35 from D. G. Eisenhut,
"Clarification of TMI Action Plan Item II.K.3.31",
November 2, 1983
 2. L. D. Butterfield letter to J. Lyons, "Westinghouse Owners
Group Transmittal of WCAP-11145," OG-190, June 11, 1986

NUREG-0737 Item II.K.3.31 requests that all licensees submit a plant specific Small Break Loss Of Coolant Accident (SBLOCA) analysis using the model developed as part of II.K.3.30. In Reference (1), the NRC Staff indicated that the resolution of Item II.K.3.31 may be accomplished by generic analyses to demonstrate that the previous NRC approved WFLASH SBLOCA Evaluation Model (EM) results were conservative when compared with the new NOTRUMP SBLOCA EM. Such generic studies were undertaken by the Westinghouse Owners Group (WOG) of which Southern California Edison is a participating member. The WOG has completed these generic studies and has submitted the results of the analyses to the NRC in the topical report WCAP-11145 (Reference 2). The purpose of this letter is to inform you that Southern California Edison is referencing topical report WCAP-11145 in order to satisfy the requirements of Item II.K.3.31 for San Onofre Unit 1, in accordance with Reference 1.

Topical report WCAP-11145 documents the results of a series of SBLOCA analyses performed with the NRC approved NOTRUMP SBLOCA EM. Cold leg break spectrum analyses were performed for the limiting SBLOCA plant from each of the Westinghouse 4-loop, 4-loop Upper Head Injection (UHI), 3-loop, and 2-loop plant categories. The limiting SBLOCA plant in each category was defined on the basis of previous SBLOCA analyses which were performed with the NRC approved WFLASH SBLOCA EM. In addition to the cold leg break analyses, a

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hot leg and a pump suction break analyses were performed as part of the 4-loop plant analyses, confirming that the cold leg was still the worst break location. Comparison of the NOTRUMP cold leg break spectrum results with the previously generated WFLASH results, showed that the WFLASH results were conservative for all plant categories. In particular, the 3-loop plant category results showed that the NOTRUMP SBLOCA EM calculated a limiting Peak Clad Temperature (PCT) which was 586°F lower than that previously calculated by the WFLASH SBLOCA EM.

The generic results documented in WCAP-11145 demonstrate that a plant specific reanalysis of the 3-loop San Onofre Unit 1 plant with the NOTRUMP SBLOCA EM would result in the calculation of a limiting PCT which would be significantly lower than the 864°F PCT currently calculated with the WFLASH SBLOCA EM. Hence, the WFLASH SBLOCA EM results which currently form the licensing basis for San Onofre Unit 1 are conservative and still valid for demonstrating the adequacy of the Emergency Core Cooling System to mitigate the consequences of a SBLOCA, as required by the Interim Acceptance Criterion (IAC). It is therefore concluded that a plant specific analysis is not needed in order for San Onofre Unit 1 to comply with Item II.K.3.31. Rather, SCE references WCAP-11145 in order to comply with Item II.K.3.31 on a generic basis, in accordance with Reference 1. This should satisfy the requirements of NUREG-0737 Item II.K.3.31.

If there are any questions, please call me.

Very truly yours,

M. D. Medford

cc: R. Dudley, NRC/NRR San Onofre Unit 1 Project Manager
F. R. Huey, NRC Senior Resident Inspector, Units 1, 2 and 3
J. B. Martin, NRC Region V, Regional Administrator