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Southern California Edison Company

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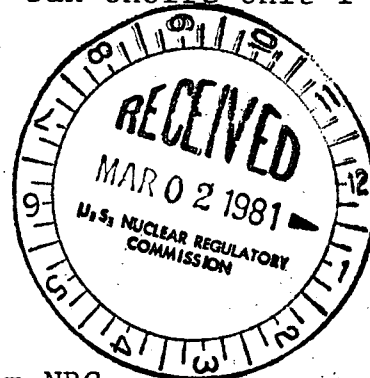
J. G. HAYNES  
MANAGER OF NUCLEAR OPERATIONS

TELEPHONE  
(213) 572-1742

February 13, 1981

Docket No. 50-206  
San Onofre Unit 1

U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region V  
1990 North California Boulevard  
Suite 202, Walnut Creek Plaza  
Walnut Creek, California 94596

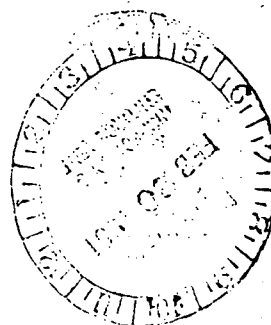


Attention: Mr. R. H. Engelken, Director

Reference: Letter dated October 15, 1980 from NRC  
(R. H. Engelken) to SCE (Dr. L. T. Papay)

The referenced letter requires that our procedures include accountability controls for all tools, equipment, materials and supplies that are used in steam generator channel heads whenever expandable seals, and their associated cover plates, are not in place in the nozzles of the reactor coolant system piping. In order to minimize radiation exposure associated with maintenance of the expandable seals, they are not retained in service except when necessary such as during channel head decontamination. Accordingly, we continue to use the required accountability controls when the expandable seals are not in service, such as during ongoing sleeving operations.

When the expandable seals are not in service, we use a tape seal between the nozzle cover and steam generator to prevent inadvertent entry of foreign material into the reactor coolant system. Administrative controls are used to verify channel head cleanliness prior to removal of this tape seal and nozzle cover.



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Our continuing review of steam generator repair activities indicates that use of the required accountability controls when the nozzle covers are in place with the tape seals, in lieu of the expandable seals, results in unnecessary delay and consequent radiation exposure. Therefore, your concurrence is requested in the following clarification of the requirement for accountability controls in the referenced letter:

" These (accountability) controls are to be in effect whenever nozzle cover plates and their appropriate seals are not in place in the nozzles of the reactor cooling system piping."

Your prompt attention to this request will be greatly appreciated. If you have any questions, please let us know.

Sincerely,



cc: L. F. Miller (NRC Site Inspector, Unit 1)  
D. M. Crutchfield, Branch Chief, NRR, DOL