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April 8, 1981

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Director of Nuclear Reactor Regulation
Attention: D. M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

Subject: Docket No. 50-206
Systematic Evaluation Program, Topic V-5
San Onofre Nuclear Generating Station
Unit 1

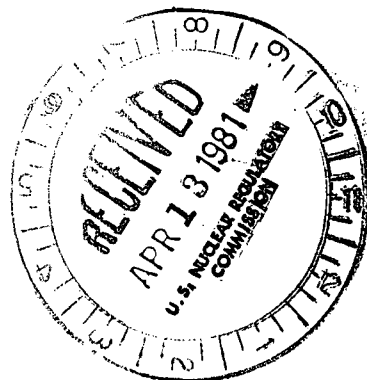
Your letter of March 10, 1981 forwarded the completed topic assessment for SEP Topic V-5, Reactor Coolant Pressure Boundary Leakage Detection. That letter requested that we examine the facts upon which the staff based its evaluation and respond either by confirming that the facts defining San Onofre Unit 1 are correct or by identifying any errors. The results of our examination of the facts defining San Onofre Unit 1 in the topic assessment are provided as an enclosure to this letter.

If you have any questions regarding the enclosed, please contact me.

Very truly yours,

M. D. Moody for W. C. Moody

Enclosure



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RESULTS OF SCE EXAMINATION OF FACTS DEFINING
SAN ONOFRE UNIT 1 IN NRC TOPIC ASSESSMENTS

V-5 Reactor Coolant Pressure Boundary Leakage Detection

In Table 1, System 2) Sump Pump Actuations (Time Meters), should be modified to delete the words "Time Meters." Sump pump actuations are recorded by log entries.

In Table 1, System 9) CVCS Makeup Flowrate should be included as a Plant Incorporated System. CVCS makeup flowrate is a reliable and accurate method of leak detection.

On page 2, Conclusions should not indicate that San Onofre Unit 1 is in compliance with Regulatory Guide 1.45. R.G. 1.45 requires that each leakage detection system employed for unidentified leakage should be adequate to detect a leakage rate, or its equivalent, of one gpm in less than one hour; in San Onofre Unit 1, each system does not have such sensitivity and response time. Presently installed sump level switches do not have the capability to detect one gpm in less than one hour; however, the containment water level instrumentation which will be installed as required by NUREG-0737 Section II.F.1(5) will have continuous indication of sphere sump level, providing the capability to detect one gpm within one hour.