Southern California Edison Company

P. O. BOX 800

2244 WALNUT GROVE AVENUE

ROSEMEAD, CALIFORNIA 91770

M. O. MEDFORD
MANAGER OF
NUCLEAR REGULATORY AFFAIRS

TELEPHONE
(818) 302-1749

December 1, 1988

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206
Spent Fuel Transshipment
San Onofre Nuclear Generating Station
Unit 1

As a result of discussion with the NRC staff on November 30, 1988 it was requested that additional information be provided by SCE in support of the NRC review of the transshipment of spent fuel from San Onofre Unit 1 to San Onofre Units 2 and 3. The purpose of this letter is to provide this information.

The NRC requested that we clarify the response to Question 8 in the enclosure to our letter dated June 10, 1988. That response indicated that we were correcting a previous statement in our letter of April 25, 1988 which had indicated that the 150% load test of ANSI N14.6-1978 would be performed based on a 5-year interval. The June 10, 1988 letter indicated that the testing should in fact be done annually. The specific statement being corrected was included in the first paragraph of the SCE Evaluation of Guideline No. 4 of NUREG-0612 in the April 25, 1988 letter and is quoted below:

> "As previously stated in SCE's August 29, 1985 letter to the NRC, after the initial 150% proof load test, SCE may opt to perform NDE in lieu of periodic (every 5 years) load testing."

Therefore, the statement in our letter of June 10, 1988 was indicating that the previously identified 5-year interval for testing, including NDE, was incorrect and a 1-year interval would be used for testing purposes.

The NRC staff also requested a description of the application of the three different yokes intended for use as part of the lift rig during transshipment and this is provided as follows. As part of the transshipment process, three yokes will be used to transport the GE IF-300 spent fuel cask. The IF 304 (short yoke) will be used exclusively at San Onofre Unit 1 to place the cask into the spent fuel pool and remove the cask from the spent fuel pool. The IF-301 (standard long yoke) will be used to transport the cask from Unit 1 to the Units 2 or 3 spent fuel cask washdown area. The IF 302 (modified long yoke) will be

A001 1/0 Add: NMSS/SGTB 4tr 1

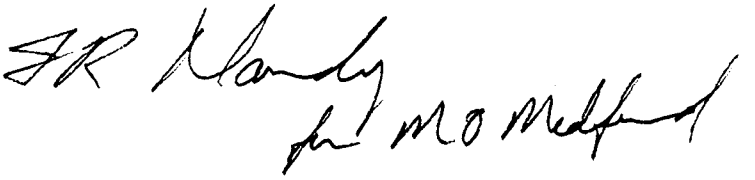
used primarily at San Onofre Units 2 or 3 to place the cask in the spent fuel pool and remove the cask from the spent fuel pool. The use of the IF 301 standard long yoke will minimize the need to decontaminate the entire lift rig each time the cask is transported between the spent fuel buildings.

The NRC also provided a staff position requiring that a 150% load test of all lifting device components be performed prior to the first use of these components at the San Onofre site and subsequent to any previous use at another facility. The option for NDE of these components as part of the annual test/inspection in accordance with ANSI N14.6-1978 would then be allowed only if the equipment remained in the control of SCE. If the equipment remains under SCE control for a period of 5 years, a 150% load test would be required prior to use after the 5-year period and this requirement would apply every 5 years thereafter. This staff position provides requirements in excess of our previous testing commitment which was to comply with ANSI N14.6-1978. We will therefore revise our plans and procedures in order to comply with this staff position. Accordingly, a 150% load test will be performed on the two components (standard long yoke and the short yoke) for which NDE had previously been credited to satisfy periodic load testing requirements prior to their use for the transshipment of fuel at San Onofre.

Finally, the NRC staff requested that we clarify the SCE Evaluation provided on Page 20 of the enclosure to our letter dated April 25, 1988. This evaluation indicates that the new spent fuel cask lifting device will meet the guidelines of ANSI N14.6-1978. The lifting device under discussion is that set of lift rigging (including the short yoke, the standard long yoke, and the modified long yoke) required to lift the new 70 ton spent fuel cask. As indicated on Page 20 of the April 25, 1988 submittal these lift rigs will comply with ANSI N14.6-1978. Two of the lift rigs (short yoke and standard long yoke) were certified by NDE and the third lift rig (modified long yoke) was certified by a 150% load test. As indicated above, the short yoke and the standard long yoke will now be 150% load tested to comply with the NRC staff position.

If you have any questions or desire additional information regarding this subject, please contact me.

Very truly yours,



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