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June 10, 1980

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

Gentlemen:

Subject: Docket No. 50-206
Automatic Initiation of Auxiliary Feedwater System
San Onofre Nuclear Generating Station
Unit 1

During a meeting with the Regulatory staff held on May 13, 1980, we reviewed (1) the various main steam line break (MSLB) accident scenarios and preliminary results performed to date showing a potential for exceeding the containment design temperature and pressure initially reported to you in our April 18, 1980 letter, (2) the details of a system design change to the safety injection actuation logic and the results of the inservice inspection of the main steam line piping being performed during the current refueling outage as a result of the MSLB preliminary results, (3) the evaluation of containment and main steam line integrity which provide assurance that the consequences of such an accident are acceptable and that the probability of a double-ended guillotine rupture of the main steam line is not credible, and (4) the current status of engineering and procurement efforts to implement the modifications to automatically initiate Auxiliary Feedwater System flow to meet the requirements set forth in Item 2.1.7.a of NUREG-0578, "Automatic Initiation of Auxiliary Feedwater System," as documented in our April 29, 1980 letter in response to the request for information contained in your April 3, 1980 letter. At the conclusion of the meeting, the Regulatory staff was advised that several additional MSLB accident scenarios were scheduled to be completed during the week of May 19, 1980, and it was mutually agreed that the information presented at the meeting as well as the additional results would be submitted in a timely manner, when available.

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Submitted herewith are twenty copies of the report entitled, "Report of Information Presented at May 13, 1980 NRC Meeting Regarding Preliminary Results of Main Steam Line Break Analyses and Auxiliary Feedwater System Automation Modifications, San Onofre Nuclear Generating Station Unit 1, June, 1980." In addition to documenting information presented at the May 13, 1980 meeting, the enclosed report reflects the additional analytical work completed subsequent to the meeting. Based on the information contained in the enclosed report as summarized in Section IV therein, the following conclusions are made:

1. The preliminary results of the various MSLB accident scenarios obtained to date warrant corrective actions (i.e., modifications to the SIAS logic) to reduce the calculated peak containment temperatures and pressures. Therefore, the requirement for these modifications constitute a reportable occurrence as defined in Technical Specification 6.9.2.a(9), and as such, is being reported pursuant to the Technical Specifications. In accordance with our April 18, 1980 letter to the NRC Office of Nuclear Reactor Regulation and our May 19, 1980 letter to the NRC Office of Inspection and Enforcement, Region V, a copy of this letter and the enclosed report is being forwarded to the NRC Region V, together with the enclosed Licensee Event Report No. 80-026, as the required narrative material to provide a complete explanation of the circumstances surrounding this matter.
2. The modifications to the SIAS logic have been determined not to involve an unreviewed safety question as defined in 10 CFR 50.59 or a change to the Technical Specifications; therefore, the implementation of the corrective actions is being made without prior NRC approval pursuant to 10 CFR 50.59.
3. The main steam line piping and containment integrity evaluations, in conjunction with the SIAS logic modifications, performed during the current refueling outage are sufficient to provide assurance that a double-ended guillotine rupture of the main steam line is not credible, that the probable consequences of a MSLB accident are no more severe than the previously calculated peak temperatures and pressures for the containment following a LOCA (considering a best estimate calculation with respect to mass and energy generation and containment heat transfer), and in the event that post MSLB temperatures and pressures exceed those previously calculated following a LOCA, containment integrity is maintained by virtue of the as-built strength of the containment.

D. M. Crutchfield

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If you have any questions, or desire further information concerning the enclosed report, please contact me.

Very truly yours

R P Bushin

Enclosures

cc: Director, Office of Inspection and Enforcement, Region V
Director, Office of Inspection and Enforcement (40)
Director, Office of Management Enforcement & Program Control (3)
Director, Nuclear Safety Analysis Center