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November 14, 1978

Director of Nuclear Reactor Regulation
Attn: Mr. D. L. Ziemann, Chief
 Operating Reactors Branch #2
 Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket 50-206
 Systematic Evaluation Program
 NRC Site Visit: May 24 and 25, 1978
 San Onofre Nuclear Generating Station
 Unit 1

By letter dated July 18, 1978 you provided us with the Regulatory Staff's report documenting their site visit to San Onofre Unit 1 on May 24 and 25, 1978. Your letter requested that we inform you of any discrepancies or errors in the report. Errors in the report are discussed below:

- 1) Discussion of the service water reservoir on page 1, item 1 incorrectly identifies the thickness of asphalt lining as 3 inches. The correct thickness is 2 inches.
- 2) The discussion on page 2, item 4 indicates that the seawall "was probably designed for a tsunami level of 13 to 15 feet MLLW." As discussed in the FSAR (Volume II, Section 1.7), the design basis for the seawall was protection against tsunamis for a run-up elevation of 13 feet MLLW. Review of the original design basis indicates that there is a design factor of safety against overturning of 1.5 considering the hydrostatic loading of the seawall to elevation 28 feet MLLW.

Deliberate additional conservatism was reflected in the construction of the seawall to the extent that the seawall provides tsunami protection to an elevation of 28 feet MLLW. Protection to elevation 28 feet MLLW is more than adequate

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in light of the fact that the Probable Maximum Tsunami for the site, assuming simultaneous high tide and storm surge, results in a maximum run-up to elevation 15.6 feet MLLW; when storm waves are superimposed, the predicted maximum run-up is to elevation 27.5 feet MLLW (San Onofre Units 2 and 3 FSAR, Volume 3, Section 2.4.6).

- 3) The discussion on page 4, paragraph 3 indicates that we will provide the Staff with additional information concerning the ability to interconnect water sources for plant shutdown. This information was provided to the Staff by telephone on August 9 and 10, 1978.
- 4) The discussion on page 4, paragraph 3 also indicates that the component cooling water heat exchangers are "located outside of the refueling water tank." Correctly stated, the component cooling water heat exchangers are located outside in an area adjacent to the refueling water storage tank.
- 5) The discussion on page 4, item 1 refers to the fact that the control room ventilation schematics (then on the docket) were not up to date. Updated control room ventilation schematics, as well as updated site grading drawings and drawings of the north drainage ditch (to facilitate Staff review of the hydrological SEP topics), have now been forwarded to the Staff by a memorandum dated August 11, 1978.

If any of the above requires clarification, please let me know.

Sincerely,



J. G. Haynes
Chief of Nuclear Engineering