Southern California Edison Company

P. O. BOX 800
2244 WALNUT GROVE AVENUE
ROSEMEAD, CALIFORNIA 91770

K. P. BASKIN
MANAGER, GENERATION ENGINEERING

TELEPHONE
213-572-1401

March 2, 1979

Director of Nuclear Reactor Regulation
Attention: 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
San Onofre Nuclear Generating Station
Unit 1

By letter dated December 21, 1978 you forwarded the docketed and site visit information your staff had assembled in their review of SEP Topic V-II.A, Requirements for Isolation of High and Low Pressure Systems. This information was presented in a tabular format by the staff. In addition, the isolation requirements for the ECCS, RHR, Reactor Coolant Water Cleanup and Sampling Systems were specified in your letter. It was requested that we verify the correctness of the data in the staff's table and provide any additional information.

Attached hereto is the staff prepared table, the accuracy of which has either been verified or corrected. Additional information has been provided where the table appeared to be less than complete.

With regard to the ECCS at San Onofre Unit 1 the staff has indicated in the table that there is no low pressure injection system. The determination of low pressure versus high pressure systems is not obvious from the table nor the criteria referenced. It is requested that the details of how such a conclusion was drawn by the staff be provided to us for review and verification of its correctness.

The isolation requirements for the cleanup and sampling system as identified in your letter relate to containment isolation and not necessarily the high pressure/low pressure interface in the system. For example, at San Onofre Unit 1, high pressure/low pressure interface in the letdown system is inside containment upstream from the containment penetration. Information reflected in the attached table relates to the containment isolation of the letdown system; high pressure/low pressure isolation information is reflected in Footnote 9 of the attached table.

A001
S 1/1

If you have any questions or require any additional information regarding this matter please let me know.

Very truly yours,

K P Bushman

Enclosures

PLANT: San Onofre

Evaluation of Isolation of Low Pressure Systems From Reactor Coolant System

Direct Interfaces[3,4]	Meets Isolation Criteria[7]	Redundancy of Isolation	Type Valves	Testable Between Valves	Location of HP/LP Interface	Check Valve Orientation	Method of Pressure Reduction	Method of Isolation	Remarks
Water Cleanup System[5]									
Inlet (Discharge)		Yes	2 EHV's & 2 manual	Yes	Inside containment[9]	NA[8]	Orifice	Operator action in control room	DWG 568767
Discharge (Charging)		Yes	1 CV & 1 check (CV 304 & 5)	No	Inside containment	Horizontal	NA	Operator action in control room	
Seal Injection System[1,5]		Yes	2 EHV's	Yes	Inside Containment	NA	RCP Seals	Operator action in control room	
ECCS									
Low Pressure Injection									No low pressure injection system
Accumulators[1]									No accumulators
Sampling System		Yes	2 CV's & 2 manual	Yes	Inside containment		Throttling valve	Normally Closed Closes on CIS	4 Sampling lines - pressurizer liquid & steam space and reactor loops B and C.
RHR System									
Suction Side		Yes	2MO	No	Inside containment	NA	NA	High pressure interlock on inboard valves other valves administratively locked out	Single drop line
Discharge Side		Yes	2MO	No	Inside containment	NA	NA		

NOTE:
1. PWRs only
2. BWRs only
3. Only direct interfaces considered--service water and component cooling water systems not evaluated
4. High pressure systems (i.e., control rod drive hydraulic, isolation condenser, standby liquid control, high pressure injection, & RCIC) connected to reactor coolant pressure boundary not evaluated
5. Inadvertent overpressurization of makeup tank due to reactor coolant pump seal leak off
6. Reactor water cleanup system for BWRs and CVCS or Letdown System for PWRS
7. Isolation requirements for ECCS specified in SRP 6.3 (Section III), for RHR system in BTP RSB 5-1 attached to SRP 5.4.7 and for water cleanup and sampling system in GDC 55
8. NA - Not Applicable
9. Letdown orifice isolation valves, CV202, 203 and 204, are located at the HP/LP interface. These valves are operated from the control room and provide isolation on an SIS signal.