

*Southern California Edison Company*



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December 10, 1979

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

Gentlemen:

SUBJECT: Docket No. 50-206  
Monitoring of Control Rod Position  
San Onofre Nuclear Generating Station  
Unit 1

By letter dated November 5, 1979, you indicated that you have completed your review of Licensee Event Reports and Technical Specification requirements related to the Control Rod Position Indication Systems at Westinghouse Pressurized Water Reactors. As a result of this review, you stated that you have decided to clarify potentially ambiguous specifications related to control rod misalignment for Westinghouse designed reactors. Specifically, you requested that we review our present technical specifications to ensure that the control rods are required to be maintained within  $\pm 12$  steps indicated position and the rod position indication system is verified to be accurate to within 12 steps. In addition, you requested that we inform you if this is not the case, together with our plans to correct the deficiencies.

The purpose of this letter is to advise you that we have completed our review of the San Onofre Unit 1 Technical Specifications in the areas discussed above. Our review indicates that control rod misalignment limitations are not presently included in the technical specifications. Accordingly, we are evaluating, in conjunction with Westinghouse, corrective actions required to assure that control rod misalignment and instrument inaccuracy are accounted for when monitoring control rod position.

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As suggested by your November 5, 1979 letter, corrective actions being considered include 1) revising our technical specifications to limit control rod misalignment to no more than that assumed in the safety analysis, 2) seeking relief by performing analysis justifying (with penalties, if needed) greater misalignment, or 3) proposing alternate or supplemental monitoring specifications to demonstrate compliance with the control rod misalignment limit.

With the cooperation of Westinghouse, a meeting has been scheduled during the week of December 17, 1979 to discuss this matter. Subsequently, we plan to advise you by December 28, 1979 of any corrective actions, if necessary, we intend to implement to ensure that control rod misalignment and instrument inaccuracy are accounted for when monitoring control rod position.

If you have any questions or desire further information concerning this matter, please contact me.

Very truly yours,

*L. D. Basbin/JH*