

*Southern California Edison Company*



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January 18, 1980

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 No. 50-206  
Systematic Evaluation Program (SEP)  
San Onofre Nuclear Generating Station  
Unit 1

Your letter of December 21, 1979 forwarded a tabulation of the status and categorization of the SEP Topics for San Onofre Unit 1. We have reviewed your letter with respect to previous correspondence from you on the various SEP Topics and additional information available on the San Onofre Units 1, 2 and 3 dockets. Enclosed are our comments on the topic categorization as represented in your December 21 letter.

If you have any questions on this matter, please call me.

A handwritten signature in cursive script, appearing to read 'J. G. Haynes'.

J. G. HAYNES

Enclosure

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January 18, 1980

COMMENTS ON NRC SEP TOPIC CATEGORIZATION  
SAN ONOFRE UNIT 1

1. Topics III-3.B, Structural and Other Consequences of Failure of Underdrain Systems, III-8.A, Loose Parts Monitoring and Core Barrel Vibration Monitoring, and XIII-1, Conduct of Operations, are listed in the column "Some Work/Information Needed From Licensee". However, these topics were listed in your letter of November 16, 1979 as either generic (topics III-8.A and XIII-1) or not applicable to San Onofre Unit 1 (topic III-3.B).
2. The following topics are listed as "Expect Major Licensee Effort" in your December 21, 1979 letter: II-3.B, Flooding Potential and Protection Requirements, II-4.A, Tectonic Province, II-4.B, Proximity of Capable Tectonic Structures in Plant Vicinity, II-4.C, Historical Seismicity Within 200 Miles of Plant, and III-3.A, Effects of High Water Level on Structures. Significant efforts have been done in the areas of flood potential and geology/seismology in the vicinity of San Onofre. In particular, Sections 2.4 and 2.5 of the San Onofre Units 2 and 3 FSAR provide detailed information on these subjects. In addition, the Site Specific Earthquake Program conducted by SCE provides information regarding the earthquake potential at San Onofre Unit 1. SCE does not anticipate additional major efforts on these topics.
3. Topic III-10.A, Thermal-Overload Protection for Motors of Motor-Operated Valves, is listed as C - Completed. SCE has received an initial assessment for this topic and provided comments on it. However, a revised topic assessment has not yet been received. This topic should be shown as R - Being Revised.
4. Topics V-4, Piping and Safe End Integrity, and VI-7.D, Long Term Cooling Passive Failures, are listed as D - Not Applicable. However, your letter of November 16, 1979 listed both of these topics as generic issues not requiring reviews. These topics should be shown as G - Generic.
5. The following topics are listed as R - Being Revised: V-10.B, Residual Heat Removal System Reliability, V-11.B, RHR Interlock Requirements, VII-3, Systems Required for Safe Shutdown, and X, Auxiliary Feedwater System. SCE has received the initial assessment for these topics but has not yet submitted comments. This topic should be shown as IC - Topic Review Initially Completed.
6. No status is specified for the following topics: XV-21, Spent Fuel Cask Drop Accidents, XV-22, Anticipated Transients Without Scram, XV-23, Multiple Tube Failures in Steam Generators, and XV-24, Loss of All AC Power. These topics should be shown as G - Generic.
7. The status and categorization are not given for Topics II-3.B.1, Capability of Operating Plants to Cope with Design Basis Flooding Conditions, and II-4, Geology and Seismology.