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February 8, 1980

Director, Office of Nuclear Reactor Regulation
Attention: Mr. D. G. Eisenhut, Acting Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

Subject: Docket No. 50-206
Additional Information in Support of Responses to NRC Requirements Related to the Three Mile Island Accident
San Onofre Nuclear Generating Station
Unit 1

This letter confirms telephone discussions with members of your staff on January 4 and January 7, 1980 in which we indicated our inability to meet several commitments regarding TMI modifications during the current outage. Specifically:

1. We will be unable to complete the installation of circuitry to automatically close the new auxiliary feedwater (AFW) motor operated discharge valve upon initiation of Safety Inspection as discussed in Enclosure 1 to our letter dated January 23, 1980. The circuitry is required for single failure protection in conjunction with the automation of the AFW System. Until the circuitry is installed, the motive power to the new valve will be disconnected by means of a disconnect switch in the locked open position and the valve hand wheel will be locked in the closed position (local manual operation of the valve will not be jeopardized) whenever the Safety Injection System is required to be operable. This configuration is consistent with the existing manual operation of the AFW System and the NRC letter dated December 21, 1979 which requires that we not automate the AFW System until the NRC has reviewed and approved the steamline and feedwater line break analyses being performed in accordance with that letter.

   It is expected that the circuitry will be installed during the refueling outage currently scheduled to commence in April, 1980. At that time, the ability will exist to operate the new AFW motor operated discharge valve remote manually from the control room.

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2. We may be unable to provide new AFW flow measurement devices for the existing emergency manual AFW flow path as discussed in Enclosure 1 to our letter dated November 21, 1979. The flow devices failed during testing and new devices may not be available prior to resumption of power operation currently scheduled for February 11, 1980. New flow measurement devices have been ordered to replace the failed devices and are expected to be delivered and installed prior to resumption of power operation. If fabrication and/or delivery problems prevent installation prior to resumption of power operation, the new flow measurement devices will be installed within thirty days of their receipt, but in no case, later than June 1, 1980.

   As discussed in our November 21, 1979 letter, the emergency manual AFW flow path and the associated new AFW flow measurement devices would be utilized in the event the normal AFW flow path, which is being automated, is not operable. The normal AFW flow path has been provided with AFW flow measurement devices and the emergency manual AFW flow path has existing steam generator water level indicators located at the manual isolation valves. The steam generator water level indicators are supplied power from the vital buses and would be utilized by the operator stationed at the manual isolation valves to maintain the proper steam generator water inventory. In addition, the operator stationed at the manual isolation valves has appropriate communication with the control room operator who also has access to steam generator water level indicators.

3. The proposed testing and surveillance specifications for the AFW System cannot be fully implemented as discussed in Enclosure 1 to our January 23, 1980 letter until the remote manual and automatic actuation of the AFW System is completed. The following items cannot be implemented at this time:

   a. As discussed in Item 1 above, the new AFW pump motor operated discharge valve must remain closed until the circuitry to automatically close the valve on a Safety Injection signal has been installed whenever the Safety Injection System is required to be operable. Accordingly, the new valve will be treated (and tested) as a closed manual valve which cannot be locked open. All other manual valves in the AFW System pump suction piping and the normal AFW flow path from the AFW pumps to the steam generators will be locked open and inspected monthly to assure proper system alignment.

b. As discussed in Item 1 above, remote manual operation capability cannot be implemented until the circuitry to automatically close the new AFW pump motor operated discharge valve has been installed. In addition, the automatic-start system will not be activated and the manual-start system will not be adversely affected until the NRC has completed their review and issued an approval of the information concerning the applicability of current analyses of a main steamline break or main feedwater line break assuming early initiation of auxiliary feedwater flow with a failure to limit flow to the affected steam generator as requested by the NRC letter dated December 21, 1979.

Accordingly, the remote manual and automatic-start circuitry for the AFW System cannot be tested periodically. As discussed in Item 1 above, the circuitry to automatically close the new AFW pump motor operated discharge valve will be installed during the refueling outage currently scheduled to commence in April, 1980. As indicated in our January 16, 1980 letter, the information requested by the NRC letter dated December 21, 1979 will be submitted by October 1, 1980.

If you have any questions concerning the above information, please contact me.

Very truly yours,

K P Baskin