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December 23, 1987

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206
Generic Letter 87-12
San Onofre Nuclear Generating Station
Unit 1

By letter dated September 24, 1987, Southern California Edison provided the response to Generic Letter 87-12 for San Onofre Unit 1. The response to Question 4 of the Generic Letter addressed various plant conditions and procedural controls associated with operations while the reactor coolant system (RCS) is partially filled. In that response, it was stated that interferences (hoses, cables, etc.) were not allowed to be routed through the personnel hatches of the containment any time the RCS is partially filled (in order to effect the prompt securing of the containment in case of loss of decay heat removal capability).

Further analysis of this matter has led to the conclusion that such interferences can and should be permitted in the same manner as they are for the equipment hatch, provided that the capability to secure the containment



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within four hours is maintained. Accordingly, enclosed is a revised response to Question 4 of the Generic Letter. Associated implementing procedures will be in place prior to operation with the RCS partially filled.

If you have any questions, please let me know.

Subscribed on this 23rd day of December, 1987.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: M. O. Medford

M. O. Medford
Manager of Nuclear Engineering
and Licensing

Subscribed and sworn to before me this 23rd day of December 1987.

Agnes Crabtree

Notary Public in and for the County of
Los Angeles, State of California

My Commission Expires: Sep. 14, 1990

OFFICIAL SEAL
AGNES CRABTREE
Notary Public-California
LOS ANGELES COUNTY
My Comm. Exp. Sep. 14, 1990

Enclosure

cc: D. Hickman, NRR Project Manager, San Onofre Unit 1
J. B. Martin, Regional Administrator, NRC Region V
F. R. Huey, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3

QUESTION 4:

"A description of the containment closure condition you require for the conduct of operations while the RCS is partially filled. Examples of areas of consideration are the equipment hatch, personnel hatches, containment purge valves, SG secondary-side condition upstream of the isolation valves (including the valves), piping penetrations, and electrical penetrations."

RESPONSE:

Containment closure capability within four hours is required by the procedures any time the RCS is partially filled. For this purpose, points of quick disconnect are required adjacent to the personnel hatch, the emergency (escape) hatch and the equipment hatch, and piping and electrical penetrations are maintained intact (capable of closure). Since an adequate RCS make up supply is required during periods when the RCS is partially filled, containment closure within four hours will provide added assurance that the health and safety of the public is not endangered if the emergency makeup/core cooling water supply were to subsequently fail. Further assurance is provided by: 1) the redundant level monitoring equipment which will help to ensure an early response to a change in RCS inventory; 2) training and procedural guidance to ensure rapid and proper identification of abnormal plant conditions during partially filled RCS operations, and to ensure appropriate actions are taken to correct the abnormal conditions as necessary; 3) administrative controls to ensure the RCS inventory and inventory control system are not challenged by maintenance and testing activities.