

Southern California Edison Company

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April 3, 1985

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U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Attention: Mr. John B. Martin, Regional Administrator

Dear Sir:

Subject: Docket Nos. 50-206, 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 1, 2 and 3

- References:
- 1) IE Bulletin No. 82-02: Degradation of Threaded Fasteners in the Reactor Coolant Pressure Boundary of PWR Plants; June 2, 1982
 - 2) J. G. Haynes (SCE) to R. H. Engelken (NRC) letter dated August 10, 1982: San Onofre Units 2 and 3
 - 3) J. G. Haynes (SCE) to R. H. Engelken (NRC) letter dated October 1, 1982: San Onofre Unit 1
 - 4) J. G. Haynes (SCE) to R. H. Engelken (NRC) letter dated December 16, 1982: San Onofre Unit 1
 - 5) J. G. Haynes (SCE) to John B. Martin (NRC) letter dated June 29, 1983: San Onofre Units 2 and 3
 - 6) J. G. Haynes (SCE) to John B. Martin (NRC) letter dated October 27, 1983: San Onofre Unit 3
 - 7) M. O. Medford (SCE) to John B. Martin (NRC) letter dated October 1, 1984: San Onofre Unit 2

In response to IE Bulletin 82-02 (Reference 1), Southern California Edison (SCE) has provided, including information provided herein, responses to all IE Bulletin 82-02 Action Items and will continue to comply with Action Item Nos. 1 and 2 as discussed below. Notification is hereby provided that Action Item No. 1, maintenance procedures and quality assurance measures for threaded fastener practices, have been implemented at San Onofre Unit 1. Notification of implementation of Action Item No. 1 for San Onofre Units 2 and 3 was provided by Reference 5. Implementation of Action Item No. 1 at all three units will remain in force. Responses to Action Item Nos. 2 and 4,

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fastener inspections, have been submitted as requested to Region V by References 5 and 7 for Unit 2 and by Reference 6 for Unit 3. Responses to Action Item Nos. 3 and 5, specific information request, were submitted to Region V by Reference 3 for Unit 1 and Reference 2 for Units 2 and 3.

In response to Action Item No. 2, at Units 2 and 3 SCE has conservatively conducted non-destructive surface examination (NDE) of removed fasteners within the scope of IE Bulletin 82-02 even when no fastener degradation had been detected by a visual examination. Based on September 14, 1984, January 2, 1985 and March 14, 1985 telephone conversations between Messrs. T. D. Mercurio and A. A. Menichiello of SCE and Mr. W. J. Collins, NRC technical contact for IE Bulletin 82-02, such NDE is required only to justify reuse of a removed fastener if a visual inspection would suggest significant degradation of a fastener, such as from boric acid attack. Accordingly, SCE will now perform a visual inspection of removed fasteners within the scope of IE Bulletin 82-02 at San Onofre Units 1, 2 and 3, if they are intended for reuse, in accordance with the ASME Code, Section XI, Article IWA-2210. Additionally, if the bolting material has been subjected to attack by boric acid an NDE will be performed on the affected fastener in accordance with the ASME Code, Section XI, Article IWA-2220 if it is planned to reuse the fastener. In all other cases the results of the visual inspection will be evaluated and the appropriate additional inspections or tests, including NDE as necessary, will be performed to determine if the fastener is qualified for reuse.

Action Item No. 4 in IE Bulletin 82-02 states that a written report of the Action Item No. 2 examinations is to be submitted to the Regional Administrator within 60 days following the completion of the outage during which Action Item No. 2 was performed. Based on a conservative interpretation of Action Item No. 4, SCE submitted three such reports to you as discussed above. However, also in the above mentioned telephone discussions between Messrs. T. D. Mercurio and A. A. Menichiello of SCE and Mr. W. J. Collins of the NRC, SCE was informed that IE Bulletin 82-02 is now being closed out by the NRC and that separate reports in response to Action Item No. 4 are no longer necessary. Accordingly, Mr. Collins agreed that it would be acceptable to include the documentation of Action Item No. 2 inspections in station Inservice Inspection (ISI) reports which will be available for NRC review at the site. Therefore, Action Item No. 2 inspection documentation will be included in station ISI reports, and separate Action Item No. 4 reports will no longer be submitted to Region V.

In conclusion, having previously submitted the information in References 2 through 7 and adequately responded to all IE Bulletin 82-02 Action Items as discussed above, including continuing implementation of the maintenance procedures and quality assurance measures per Action Item No. 1

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and documenting threaded fastener inspections in station ISI reports, SCE considers that compliance with IE Bulletin 82-02 has been demonstrated for San Onofre Units 1, 2 and 3.

If you have any questions or would like additional clarification concerning the above, please contact me.

Subscribed on this 2nd day of April, 1985.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By:

M. O. Medford

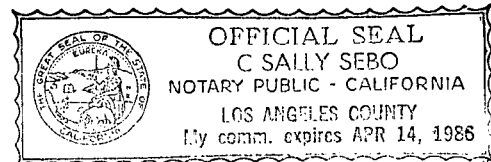
M. O. Medford
Manager, Nuclear Licensing

Subscribed and sworn to before me this
2nd day of April, 1985.

C. Sally Sebo

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

My Commission Expires: Apr 14, 1986



cc: Director, Office of Inspection and Enforcement, NRC
F. R. Huey (USNRC Senior Resident Inspector)