



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

September 24, 1982

OFFICE OF THE
COMMISSIONER

MEMORANDUM FOR: Executive Director for Operations
FROM: John Ahearne *[Signature]*
SUBJECT: SAN ONOFRE UNIT 1

EDO 12008

On July 22nd you responded to a June 18th memo requesting a response to my comments on the Director's Denial of 2.206 relief (Secy 82-63). Specifically you addressed the question I had with respect to the categorization of portions of the turbine building complex as Category B, although they should have been Category A (my judgment). Your answer states:

"The classification of the turbine building complex as Category B structures was consistent with prevailing industrial and regulatory practices at the time the San Onofre design was conceived."

I would appreciate answers to the following questions:

1. Does the staff agree that these portions of the turbine building complex should be Category A-- that is, does the staff agree that they contain systems and components necessary for safe shutdown and accident mitigation and thus, should be Category A?
 - (a) If the answer is no, please explain.
 - (b) If the answer is yes, then I have a second question.
2. Does the quoted statement above in your answer mean that prevailing practice both in the industry and in the AEC was not to require equipment that would be necessary for a safe shutdown to have Category A protection? If that is the case and if we now believe it should, then what is the staff program to review other plants designed and approved in this era to assure that they too don't have similar problems?

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Rec'd Off. EDO
Date 9-27-82
Time 1:45 PM

The document control system shows a May 10, 1982 draft SER on the seismic design of San Onofre Unit 1 and comments from various divisions, but no final SER. I recognize that events since the publication of this draft have changed staff's program of review. However, I would appreciate receiving answers to the following questions:

1. Is there a revised draft SER or a final SER, and if so, is it available?
2. If not, what is your schedule for making such available?
3. What are the acceptance criteria for restart which the staff intends to use? These become particularly important in light of the following statements in the May 10 draft SER:
 - (a) "The licensee...refused to perform the additional time history analysis." (p. 8)
 - (b) "The staff is unable to conclude that the main reactor coolant system piping and components are adequately supported for design for a 0.67g Housner SSE." (p. 9)
 - (c) "Therefore, function of the CVCS [Chemical Volume Control System] would be lost at 0.67g Housner." (p. 9)
 - (d) "Safety injection system integrity, therefore, cannot be assured." (p. 11)
 - (e) "RHR, CCW and spent fuel pool cooling systems function cannot be assured." (p. 12)
 - (f) "We consider the licensee statement that small diameter piping will never fail, regardless of the loads applied, to be unfounded and without basis." (p. 19)
 - (g) "...It is not possible to reach any conclusion concerning the adequacy of the original seismic design of Emergency Core Cooling Systems at San Onofre Unit 1." (p. 24)

cc: Chairman Palladino
 Commissioner Gilinsky
 Commissioner Roberts
 Commissioner Asselstine
 Secy
 OPE
 OGC