June 16, 1981

Dock et No. 50-206 LS05-81-06-054

> Mr. R. Dietch Vice President Nuclear Engineering and Operations Southern California Edison Company 2244 Walnut Grove Avenue Post Office Box 800 Rosemead, California 91770

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Dear Mr. Dietch:

SUBJECT: EVALUATION OF ACTION PLAN ITEM I.C.1 FOR WESTINGHOUSE PLANTS

(NUREG-0737)

Re: San Onofre Unit 1

The NRC staff has completed an interim review of the Westinghouse Owners Group submittal for Action Plan Item I.C.1, Guidance for the Evaluation and Development of Procedures for Transients and Accidents. We have identified the following deficiencies in the Owners Group proposal:

- Proposed guidelines do not provide smooth transitions from the event procedures to direct the operator if subsequent multiple or consequential failure occur.
- The proposed schedule for completing the program does not appear responsive to NUREG-0737, Item I.C.1 and we believe that additional work is necessary.
- 3. The staff has serious doubts that the full range of initiating events and subsequent failures can be addressed within the proposed event specific framework.

A copy of our letter to the Owners Group is enclosed for your information.

Sincerely,

Original signed by

Dennis M. Crutchfield, Chief Operating Reactors Branch #5 Division of Licensing

Enclosure: As stated

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

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Dennis M. Crutchfield, Whief Operating Reactors Branch #5

Division of Licensing

Enclosure: As stated

cc w/enclosure: See next page cc Charles R. Kocher, Assistant General Counsel Southern California Edison Company Post Office Box 800 Rosemead, California 91770

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