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MANAGER, GENERATION ENGINEERING

November 2, 1976

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Director of Nuclear Reactor Regulation
ATTN: Mr. K. R. Goller
Assistant Director for Operating Reactors
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Gentlemen:

Subject: Docket No. 50-206, Provisional
Operating License No. DPR-13
Steam Generator Tube Inspection Program
San Onofre Nuclear Generating Station, Unit 1

Our letter dated October 26, 1976 provided specific commitments concerning a steam generator tube inspection program at San Onofre Unit 1 to assure the integrity of the small radius steam generator tubes. We advised you that the specific steam generator tube inspections and any remedial action designed to limit the possibility for U-bend leakage as determined by the inspection findings would be accomplished to the satisfaction of the NRC and ourselves prior to resumption of power operation at San Onofre Unit 1. We also indicated that we were finalizing the details of our specific participation in a general program for steam generator tube inspections involving the cooperation of three (3) other utilities, in addition to ourselves, and the participation of the Westinghouse Electric Corporation.

The purpose of this letter is to provide you with the details of our specific participation in the general program for steam generator tube inspections. The proposed general program is described in Enclosure 1. The details of each of the inspection items, the information to be gained and the application of the information to the overall general program are described in Enclosure 2. The specific participation of San Onofre Unit 1 in the general program, and the schedule associated therewith are described in Enclosure 3.

As indicated in Enclosure 3, we propose to perform (1) handhole inspections, (2) upper bundle entry inspections, and (3) eddy current testing to ascertain the condition of the

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upper steam generator tube support plates. We are currently examining the access available in each steam generator to determine whether these inspection items will allow us to satisfactorily ascertain the condition of the upper tube support plates. If sufficient accessibility is not available, alternative measures will be taken, as necessary, to ascertain the condition of the upper tube support plates.

We expect that the above-described access examination will be completed, and the alternative measures, including the associated schedule, if required, will be identified by November 8, 1976. Subsequently, we would be prepared to meet with the NRC staff later that week to discuss the final details of our specific steam generator tube inspection program. We will contact you later this week as our inspection plans become more firm to establish a proposed meeting date.

If you have any questions or require additional information concerning our plans discussed above, please contact me.

Very truly yours,

LP Baskin /JH

Enclosures (3)

cc: R. H. Engelken (Director, Region V)
Jack B. Moore

ENCLOSURE 1

As a result of the evaluation of Row 1 U-bend tubes removed from Surry Steam Generator 2-A, the program of action which follows was formulated by the involved utilities with the participation of the Westinghouse Electric Corporation. This program has three general objectives:

1. Establish whether or not the condition is confined to Surry Unit 2.
2. Verify the correlation between flow slot bowing and the change in ovalization of U-bend tubes as it relates to tube conditions observed at Surry Unit 2.
3. Define and implement a program that will assure the continued safe operation of the affected steam generators.

The proposed program consists of five separate types of inspections with appropriate evaluation as follows:

1. Handhole entry inspection of first tube support plate flow slots.
 - a. Visual
 - b. Photos/TV Camera
 - c. Measurement of Flow Slots
2. Upper bundle entry.
 - a. TV Camera/Videotaping
3. Eddy current probing in Rows 1 through 5 around U-bend to the extent possible.
4. Drilling 3-inch access opening at the top tube support plate.
 - a. Tube sample removal from Rows 1 (and if possible from Row 2)
 - b. Visual/Photos
 - c. Measurement of Flow Slots
5. Tube pulling (through tubesheet). Removal of a leaky dent.

These inspections are more fully described in Enclosure 2.