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J. G. HAYNES
MANAGER OF NUCLEAR OPERATIONS

December 16, 1982

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

Attention: Mr. R. H. Engelken, Regional Administrator

Gentlemen:

Subject: Docket No. 50-206
I.E. Bulletin No. 82-02: Degradation of Threaded Fasteners
in the Reactor Coolant Pressure Boundary of PWR Plants
San Onofre Nuclear Generating Station
Unit 1

I.E. Bulletin No. 82-02 requested we perform five action items intended to monitor and prevent degradation of reactor coolant pressure boundary threaded fasteners. The status of these action items is as follows. The report requested by Action Item No. 5 of information identified as a result of performing Action Item No. 3 was provided by our October 1, 1982 letter. This letter also informed you that we will submit the reports requested by Action Item No. 4 within 90 days of the completion of outages during which Action Item No. 2 is performed. These reports provide the results of the inspections requested by Action Item No. 2. In addition, a statement confirming completion of Action Item No. 1 is to be included in the first report we submit in response to Action Item No. 4 as requested by the bulletin.

The purpose of this letter is to inform you that after further consideration we have decided to continue inspecting the reactor vessel head closure fasteners in conjunction with our in-service inspection (ISI) program rather than Action Item No. 2. This decision is based on the adequacy of our ISI program and our operating history as discussed below.

Our ISI program and Action Item No. 2 provide comparable assurance that degraded reactor vessel head closure fasteners will be identified. Action Item No. 2 inspections would be required every time the reactor vessel head is removed while ISI requires inspections at forty month intervals of one-third of the fasteners. ISI inspections are more detailed, however, since surface and volumetric examinations are performed compared to the visual and surface examinations required by Action Item No. 2. Therefore, we consider our ISI program to be as reliable as Action Item No. 2 would be for identifying degraded reactor vessel head closure fasteners.

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The reactor vessel head closure is sealed with an inner and outer O-ring configuration with leakage past the inner O-ring monitored by the reactor vessel flange leak detection system. As indicated in our October 1, 1982 submittal in response to Action Item No. 5, the vessel head closure fasteners have not been exposed to coolant leakage and boric acid induced degradation of threaded fasteners has not been a problem at San Onofre Unit 1. Since vessel head closure fastener degradation has not been a problem at San Onofre Unit 1, we consider a change in the inspection program for these fasteners to be unnecessary.

Inspection of reactor vessel head closure fasteners in accordance with Action Item No. 2 would also require a considerable effort to implement procedural and administrative control changes and to retrain personnel. Since ISI provides reasonable assurance that degraded vessel head closure fasteners will be identified and our operating history indicates that boric acid induced threaded fastener degradation is not a problem, we consider the effort required to implement Action Item No. 2 for these fasteners to be unnecessary. Therefore, we will continue to inspect reactor vessel head closure fasteners in accordance with ISI.

Please contact me if you have any questions or require further information concerning this matter.

Very truly yours,

By J. G. Haynes
 J. G. Haynes
 Manager of Nuclear Engineering,

On this 16th day of December, 1982,
 before me, personally appeared
 J. G. Haynes, personally known to me
 to be the person whose name is
 subscribed to this instrument, and
 acknowledged that he executed it.

D. Stanley Fay
 Notary Public in and for the County
 of Los Angeles, State of California

