



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

February 10, 1982

MEMORANDUM FOR: Darrell G. Eisenhower, Director, Division of Licensing, NRR
FROM: Robert H. Engelken, Regional Administrator, Region V
SUBJECT: SOUTHERN CALIFORNIA EDISON COMPANY, SAN ONOFRE UNIT 2
DOCKET NO. 50-361

Based on the results of our inspection efforts, we have determined that construction and preoperational testing of the subject facility have been completed in substantial agreement with docketed commitments and regulatory requirements, with the exceptions listed in Enclosure 1. Region V has no further items which would preclude issuance of an Operating License to permit facility operation up to five percent (5%) of full power. It is recommended, however, that the operating license be conditioned with the information contained in Enclosure 1.

In addition, we have several comments on the draft license transmitted by the H. Rood memorandum to R. H. Engelken, et al, dated February 3, 1982. These comments are presented in Enclosure 2. Your particular attention is directed to Comment No. 5 of Enclosure 2.

We have reviewed the applicant's preparations for implementation of the Quality Assurance Program for Operations and have found that they meet the requirements of 10 CFR 50, Appendix B, as specified in the applicant's Quality Assurance Program (Chapter 17 of the FSAR), which was reviewed by the Office of Nuclear Reactor Regulation.

Robert H. Engelken
Regional Administrator

Enclosures:
As Stated

cc: R. L. Tedesco, A/D, DL, NRR
F. J. Miraglia, Chief, LB3, NRR
H. Rood, LB3, NRR
J. L. Crews, Director, DRRP&EI, RV
D. M. Sternberg, RV
G. B. Zwetzig, RV
D. F. Kirsch, RV
A. E. Chaffee, SRI, San Onofre 2, RV
R. C. DeYoung, Director, IE
B. Grimes, Director, DEP, IE

NOTE: Dist per H. Rood

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D. G. Eisenhut

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February 10, 1982

cc (Cont.):

J. Taylor, Director, DRP, IE
E. Jordan, Director, DE&QA, IE
L. Cobb, Director, DFFM&S, IE
G. S. Spencer, Director, DTI, RV
L. Norderhaug, RV
D. Schuster, RV
W. Mortensen, RV
H. Book, RV
F. Wenslawski, RV
M. Cillis, RV
B. Faulkenberry, RV
T. Bishop, RV
J. Eckhardt, RV

Recommended Additions/Revisions to License Conditions*License No. NPF-10, San Onofre Unit 2, Docket No. 50-361

1. Paragraph C(16) - Renumber C(16)b to C(16)c and insert new C(16)b as follows:
 - b. Prior to fuel load, SCE shall have completed inspection of all Unit 2 and common fire seals and shall have repaired deficient seals or implemented compensatory measures as defined in Appendix A to this license.

(Note, however, Comment No. 4 of Enclosure 2 which suggests that Fire Protection measures could be delayed until criticality.)
2. Paragraph C(18)i - Revise as follows:

Prior to exceeding five (5) percent power, the post-accident sampling system shall be operable and the post-accident sampling program identified in Appendix A to this license (Section 6.8.4.d) shall be fully implemented.
3. Paragraph C - Add the following license condition:

Prior to initial entry into operating Mode 2, the laboratory instrumentation described in Sections 11.5.2.2.2 and 12.5.2.2.1 of the Final Safety Analysis Report shall be calibrated and shall be capable of analyzing sample types and geometries necessary to support facility operation. In addition, at that time there shall also be approved, written procedures governing laboratory operations and analyses.
4. Paragraph C - It is our understanding that NRR will insert a license condition providing interim relief from the Technical Specification requirements pertaining to a Process Control Program.
5. Paragraph C - Add the following:

(19) Surveillance Program

Prior to entering any operational mode for the first time, including initial fuel loading, the licensee shall:

 - (a) Have completed a review of the surveillance procedures applicable to the change of mode, and determined that the procedures demonstrate the operability of the required systems with respect to all acceptance criteria defined in the Technical Specifications and/or FSAR.
 - (b) Have dispatched written certification to the Regional Administrator, Region V, that the actions defined in (a), above, have been completed for the mode or modes to be entered.

*References are to draft license additions to H. Phod memorandum to Engelken, et al, dated February 3, 1982, Subject: "San Onofre 2 Low Power License."

Comments on Draft Low Power License*License No. NPF-10, San Onofre Unit 2, Docket No. 50-361

1. License should be for a minimum of two years. This should be done to avoid unnecessary administrative actions in the event delays (e.g., similar to Diablo Canyon) prevent conduct of fuel loading and/or low power tests or issuance of a full power license within one year.
2. Paragraph C(7) should specify date of NUREG-0588 to avoid ambiguity in the event subsequent revisions are issued.
3. Paragraphs C(8) and C(9) are not applicable to a one year, low power license. The same comment applies to Paragraphs C(11), C(12), C(14), C(15), C(16)b, C(17), C(18)f (above five percent (5%) power), C(18)i, C(18)k, C(18)l, C(18)m, and C(18)n.
4. Paragraph C(16)a should be defined as becoming effective prior to criticality (i.e., prior to entering Mode 2). This is because fire protection is probably not needed to protect the health and safety of the public until there is a significant fission product inventory or decay heat power level.
5. Based on discussions between Region V, SCE, and NRR (ETSB) personnel, an attachment should be provided to define the interim relief from Technical Specifications requirements to be granted in the areas of process and effluent monitors, interlaboratory comparison programs, land use census and Regulatory Guide 4.15, Revision 1, Quality Assurance requirements. The extent of this relief has been defined in discussions between Region V, SCE, and NRR (ETSB) personnel and a copy of the agreed-to conclusions is being provided by SCE. The attachment was originally intended to be a license condition, but it could also be incorporated as an attachment to the Technical Specifications.
6. It is not clear why the immediate notification requirement of Paragraph 2.H is necessary in light of the notification already required by 10 CFR 50.72.

*Enclosure to H. Rood memorandum of February 3, 1982, to R. H. Engelken, et al,
Subject: San Onofre 2 Low Power License.