



An EDISON INTERNATIONAL Company

Dwight E. Nunn  
Vice President

April 22, 1996

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
Updated Final Safety Analysis Report  
San Onofre Nuclear Generating Station  
Units 2 and 3

- References: 1) Letter, Thomas P. Gwynn (NRC) to Harold B. Ray (Edison), NRC Inspection Report 50-361/95-26 and 50-362/95-26, dated January 19, 1996.
- 2) Letter, Dwight E. Nunn (Edison) to Document Control Desk (NRC), Reply to a Notice of Violation (IR 95-26), dated February 20, 1996.
- 3) Letter, Walter C. Marsh (Edison) to Document Control Desk (NRC), Design Basis Documentation (DBD) and Reconstitution Plan, Units 2 and 3, dated October 6, 1993.

In response to Reference 1, this letter provides Edison's plans relative to reviewing and updating the information in the San Onofre Units 2 and 3 Updated Final Safety Analysis Report (UFSAR).

In the NRC's January 19, 1996 Inspection Report (Reference 1), six minor inconsistencies were identified between information in the UFSAR and other plant design information. In accordance with our February 20, 1996 letter (Reference 2), Edison performed a limited review of the UFSAR. That review also identified a number of differences between the UFSAR and various design documents and plant design details. These differences were similar to the findings reported in Reference 1 and primarily involve discrepancies in the details of specific data and descriptive information in the UFSAR. The primary cause of the discrepancies appears to be a lack of attention to detail sufficient to maintain the UFSAR as an error free document.

Based on our assessment of the discrepancies identified by both Edison and the NRC, we conclude that the UFSAR is fundamentally sound with respect to its overall evaluation of the safety of San Onofre Units 2 and 3. However, given the importance of the UFSAR, we have concluded it is appropriate to perform a comprehensive review of the UFSAR to correct all such errors to assure its accuracy even in such descriptive and design details. To do a detailed review of this massive, 24 volume document to the degree of detail and level of

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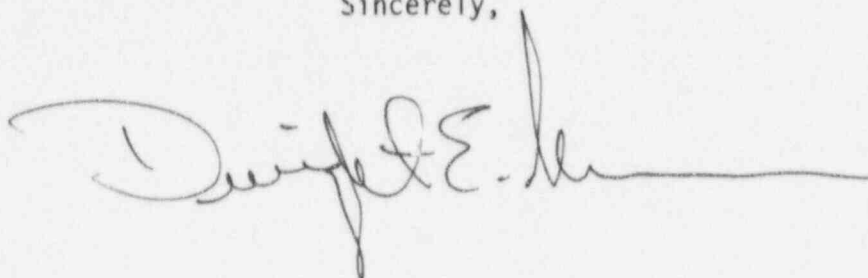
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accuracy desired, we will need to use the design and system engineers and licensing personnel most familiar with the systems and processes described in the UFSAR rather than outsource the activity. We anticipate expending in excess of 20,000 manhours within the engineering and licensing organizations over the 20 months available for the work. As refueling outages for Unit 2 and Unit 3 are also encompassed in this time frame, the review effort will be a major resource demand over the entire period. This review will be done in parallel with the completion of our on-going detailed evaluation of minor open items from Open Item Reports or (OIRs) from our design basis reconstitution effort. Reference 3 provided our design basis reconstitution program status including our plans for final resolution of open items. The last 74 of the original 547 OIRs will be completed by early next year. The results of both these efforts will be incorporated into the next major revision of the UFSAR. In accordance with 10 CFR 50.71(e)(4), this revision is scheduled to be submitted 6 months after the Unit 3 Cycle 9 outage (approximately December 1997).

Because of the importance of this effort, we would like to meet with the NRC to brief you on the elements of our program. If you have any questions on our plans or would like to discuss this further, please call me.

Sincerely,



cc: L. J. Callan, Regional Administrator, NRC Region IV  
J. E. Dyer, Director, Division of Reactor Projects, Region IV  
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV  
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