

September 23, 1998

Mr. Harold B. Ray  
Executive Vice President  
Southern California Edison Company  
San Onofre Nuclear Generating Station  
P. O. Box 128  
San Clemente, California 92674-0128

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR LOAD SEQUENCER TIME  
DELAY RELAY AMENDMENT (TAC NOS. M95865 AND M95866)

Dear Mr. Ray:

In a letter dated May 29, 1996, Southern California Edison (SCE) submitted a request to modify the licenses for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3. The proposed modification would revise the acceptance criteria for the Agastat time delay relays used in the engineered safety features (ESF) load sequencer for the diesel generators.

The staff has reviewed your license amendment request. To assist the staff in completing its review, we request that you provide the information identified in the enclosure.

Please call me at (301) 415-1352 if you have any questions.

Sincerely,

Original Signed By

James W. Clifford, Senior Project Manager  
Project Directorate IV-2  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Docket Nos. 50-361  
and 50-362

Enclosure: Request for Additional  
Information

cc w/encl: See next page

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Mr. Harold B. Ray

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September 23, 1998

cc w/encl:

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REQUEST FOR ADDITIONAL INFORMATION

DIESEL GENERATOR LOAD SEQUENCER TIME DELAY RELAYS

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL.

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

DOCKET NOS. 50-361 AND 50-362

1. What is the actual repeat accuracy of the Agastat time delay relays used to sequence engineered safety features loads at San Onofre Units 1 and 2, based on operational data collected since initial licensing? This should include a description of how the repeat accuracy was determined. As a minimum, state:
  - (a) the total population of relays tested;
  - (b) summarize the number of relays discovered during surveillance testing at each unit that were out of calibration by more than +/- 10 percent of the relay setpoint;
  - (c) when the failures were observed; and
  - (d) any patterns or trends, or lack thereof, noted in the relay operational data.

Your response to this question should be sufficiently detailed to justify the extent of relief required, and whether or not a valid acceptance criteria exists.

2. Discuss how the Agastat relays are calibrated and how the required surveillance testing of these relays is currently performed. Discuss what, if any, changes in the calibration or surveillance testing will be made if the staff approves this amendment request. This discussion should be sufficiently detailed to clearly describe how the current sequencing acceptance criteria impacts plant operations, and how the proposed licensing amendment will eliminate any unnecessary impact without affecting safety.
3. Discuss the current process used to identify, track, and replace problem Agastat relays. Include a discussion of what, if any, changes will be made to this process if the sequencing acceptance criteria are relaxed. Describe the controls that will be in place to ensure that problem relays (e.g., bad relays that might pass a relaxed sequencing acceptance criteria) are not left in service.
4. Discuss all the options that were considered to resolve the Agastat relay issues raised by the NRC in Inspection Report 50-351/95-04 and 50-362/95-04. Discuss the objectives used to evaluate these possible solutions and why requesting a change to the sequencing acceptance criteria was the chosen solution.

5. Provide a list of assumptions used in the diesel generator loading analysis provided to the NRC to support a relaxation of the sequencing acceptance criteria. Discuss how the data used in the analysis was collected and verified. Discuss the results of any benchmark tests performed to validate the accuracy of the computer loading analysis and to determine the sensitivity of the analysis results to changes in the input data. This discussion should fully describe how much reliance was placed on the results of the loading analysis provided in support of the proposed license amendment.