



SOUTHERN CALIFORNIA  
**EDISON**

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Manager of  
Nuclear Regulatory Affairs

November 23, 1998

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

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**  
**Development of SER Constraints for Reload Analysis Topical Report**  
**San Onofre Nuclear Generating Station Units 2 and 3**

Reference: June 16, 1998 Meeting between SCE, Asea Brown Bovari (ABB)  
Combustion Engineering (CE), and NRC Staff at White Flint to  
Discuss Reload Analysis Technology Transfer from ABB CE to SCE  
for San Onofre Nuclear Generating Station Units 2 and 3.

Gentlemen:

At the referenced meeting with the Nuclear Regulatory Commission (NRC) staff on June 16, 1998, Southern California Edison (SCE) discussed the development and submittal of a reload analysis methodology topical report. NRC approval of this topical report will allow SCE to independently perform reload fuel cycle safety analyses that are now performed with fuel vendor support. During the course of the meeting SCE committed to provide a tabulation of limitations and/or constraints imposed by the NRC in Safety Evaluation Reports (SERs) applicable to the analysis methodology documentation (typically, but not always, topical reports). The purpose of this letter is to continue to keep the NRC informed regarding the approach being followed by SCE to develop the tabulation of SER limitations and/or constraints.

SCE employs the ABB Combustion Engineering (ABB-CE) reload analysis package of methodologies which were obtained through a technology transfer program. The methodologies which make up the ABB-CE reload analysis package have been previously reviewed and approved for use by the NRC. The SCE reload analysis topical report SCE-9801-P, "Reload Analysis Methodology for the San Onofre Nuclear Generating Station Units 2 and 3," which we expect to submit on or about December 1, 1998, will explicitly define which ABB-CE methodology documentation and associated NRC SERs are being used by SCE. In a separate submittal, which will follow the reload analysis topical report and be submitted in early February, 1999, SCE will provide a tabulation of SER limitations and/or constraints associated with the cited methodologies. This submittal will be made in time to support the requested April 1, 1999 topical report approval date.

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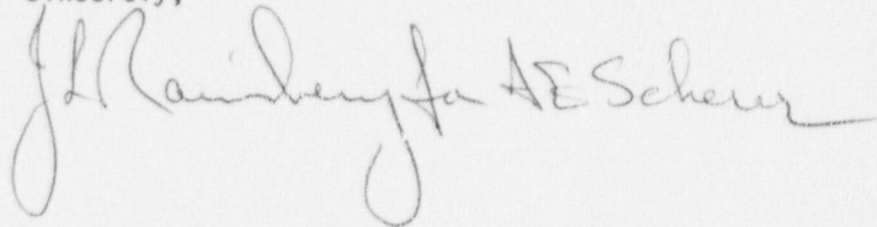
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Since the identification and tabulation of the limitations and/or constraints for approximately forty (40) methodologies is a significant effort, SCE is taking this opportunity to inform the NRC of the detailed approach being followed. This is especially important given the absence of formal regulatory guidance pertinent to the NRC requested report. To this end, Enclosure I provides a discussion of the ground rules being applied to the identification of limitations and/or constraints, relevant definitions, and explanatory examples, where appropriate. The ground rules presented are essentially the same as those previously used for a similar effort by another utility with fuel supplied by ABB-CE. In their case, the ground rules were applied to the identification and development of SER limitations and/or constraints for methodologies supporting a Technical Specification amendment request.

SCE, in conjunction with ABB-CE, the methodology developer, is proceeding with the above described approach to tabulate the SER limitations and/or constraints associated with the methodologies cited in the San Onofre Units 2 and 3 topical report. As discussed above, the SCE reload analysis topical report SCE-9801-P is targeted for submittal to the NRC on or about December 1, 1998. As discussed above, the tabulated SER limitations and/or constraints will be submitted to the NRC in early February, 1999 in support of the April 1, 1999 topical report approval date.

If you have any questions regarding the information provided herewith, or if this will not meet your requirements on this matter, please contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. L. Rainey for A. E. Scherer". The signature is written in dark ink on a white background.

Enclosure

cc: E. W. Merschoff, Regional Administrator, NRC Region IV  
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3  
J. W. Clifford, NRC Project Manager, San Onofre Units 2 and 3

**ENCLOSURE I**

**Southern California Edison  
San Onofre Nuclear Generating Station  
Units 2 and 3**

**Approach to Development of SER Limitations  
and/or Constraints Associated With  
Methodologies Cited in the SCE Reload Analysis  
Topical Report**

## Approach to Development of SER Limitations and/or Constraints Associated With Methodologies Cited in the SCE Reload Analysis Topical Report

SCE, in conjunction with ABB-CE, will use the following groundrules for reviewing SERs related to implementation of SCE's reload analysis topical report to identify NRC imposed limitations and/or constraints, if any, contained therein:

1. Candidate SERs for review are those associated with the methodology documentation (typically, but not always, topical reports) cited in the SCE reload analysis topical report. These methodologies are employed in the performance of UFSAR Chapter 15 safety analyses. This includes physics, fuel performance and fuel thermal-hydraulic analyses used in support of the UFSAR Chapter 15 analyses. As the SCE reload analysis topical will not include LOCA analysis methodology, no LOCA SERs will be reviewed.

SERs associated with methodologies applicable to existing Analyses of Record (AORs) or analyses performed in support of other UFSAR chapters are outside the scope of this limitation and/or constraint identification review.

2. In a broad sense, "methods" or "methodology" means analytical procedures, processes, computer codes and calculation techniques that have been documented for use in design and analysis of nuclear power plants and which are subject to the controls outlined in 10 CFR 50, Appendix B Sections III, V and VI, Design Control; Instructions, Procedures, and Drawings; and Document Control, respectively. However, within the context of SER reviews, "methods" or "methodology" are specifically limited to those that have been submitted to the NRC for review and approval and for which an SER approving use was issued by the NRC.
3. Ancillary SERs for supporting a) analytic methodologies, b) imbedded correlations, c) experimental data, d) sensitivity studies, etc., not explicitly used in support of SCE's reload analysis methodology topical report, will not be reviewed at this time. That is, SERs that may exist for supporting analytic methodologies will not be reviewed as part of the review conducted for the top level document SER.

4. The limitations and/or constraints identification review will be restricted to the identified SER itself. That is, the associated analytic methodology (typically, but not always, topical reports) and associated sub-tier supporting information (e.g., responses to NRC RAIs), for which the SER was written, will not themselves, for purposes of this report, be reviewed to identify any limitations and/or constraints imposed therein by the methodology developer.
5. SER limitations and/or constraints are defined as being only those imposed by the NRC that are above and beyond any self-imposed limitations and/or constraints discussed by the methodology developer in the associated analytic methodology documentation. That is, in the course of its SER discussion, the NRC typically restates portions of the associated methodology discussion so that their presentation can be understood in the proper context. Occasionally, such restatements include the self-imposed limitations and/or constraints of the methodology developer. Such restatements of self-imposed limitations and/or constraints will not be identified as being NRC imposed nor will they be tabulated as part of this review.
6. Occasionally SERs have as an attachment, or reference, the Technical Evaluation Report (TER) provided by the NRC's methodology review staff or review Contractor. The TER is not considered to be a valid source for identification of limitations and/or constraints. This groundrule is based on the TER being a working level document which may offer various opinions, options and regulatory viewpoints for NRC management consideration when formulating the SER itself. Accordingly, any limitations and/or constraints identified and recommended in the TER would have to be carried forward through the NRC management approval process into the SER itself, or be specifically referenced in the SER as being adopted by the NRC Staff before being considered a viable limitation and/or constraint.

7. A limitation and/or constraint must be an explicit statement which can readily be understood to require the imposition of a certain restriction. For example, they may be preceded by a "must", "shall", "is only acceptable when" or "is required to" type of phrase. Statements preceded by such phrases as "may", "should", "it is recommended", "it is suggested", "it is requested" or other such non-explicit phrases will not be identified as limitations and/or constraints and, consequently, will not be captured as part of this effort. The premise upon which this groundrule is based is simply that the NRC could not have issued an SER approving a methodology for immediate use if there was yet a contingent action that had to be accomplished in order to satisfy some review concern(s).
8. Limitations and/or constraints of an administrative nature will not be captured as part of this review. SERs will only be reviewed for technical limitations and/or constraints. Two (2) examples of administrative limitations and/or constraints would be:
  - In accordance with the procedures established in NUREG-0390, it is requested that an accepted version of this report be published within three months of receipt of this letter.
  - When the proprietary report is referenced, the non-proprietary version must also be referenced.