



SOUTHERN CALIFORNIA  
**EDISON**

An EDISON INTERNATIONAL Company

J. L. Rainsberry  
Manager, Plant Licensing

December 5, 1997

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
Request for Technical Specification Interpretation  
San Onofre Nuclear Generating Station  
Units 2 and 3

This letter requests an interpretation of Technical Specification 3.8.1 Action B.2 in accordance with Information Notice 97-80, "Licensee Technical Specifications Interpretations." Action B.2 states: "Declare required feature(s) supported by the inoperable DG inoperable when its redundant required feature(s) is inoperable."

As indicated in the Basis to Technical Specification 3.8.1, "Required Action B.2 is intended to provide assurance that a loss of offsite power, during the period that a DG is inoperable, does not result in a complete loss of safety function of critical systems. These features are designed with redundant trains. This includes motor driven auxiliary feedwater pumps. Single train systems, such as turbine driven auxiliary feedwater pumps, are not included. Redundant required feature failures consist of inoperable features associated with a train, redundant to the train that has an inoperable DG." However, the specific features covered by this Action are not specifically identified in the San Onofre Technical Specifications or Bases. An NRC interpretation of the applicable features covered by this Action is requested.

It is SCE's understanding that the specific features to which this Action applies are those "critical features" that require 1E power from one of the 4 kV buses (A04 or B04 at San Onofre Units 2 and 3) to perform their safety function in the event of a loss of offsite power. Systems that fail in their safe position on loss of power, do not require power, or whose failure does not result in a "complete loss of safety function" are not included. In addition, instrumentation that is powered from a battery backed source (e.g., the vital buses) is also not included. This instrumentation would not suffer a "complete loss of safety function" in the event of a loss of offsite power because of the battery backup power.

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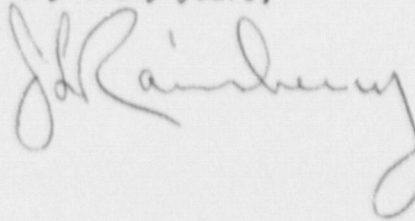
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Based on this understanding, SCE currently includes the following systems within the scope of Action B.2 (the associated Technical Specifications (TS) are listed in parentheses): boration systems (TS 3.1.9), emergency core cooling systems (TS 3.5.2), containment spray and cooling systems (TS 3.6.6.1), containment dome air circulators (TS 3.6.8), auxiliary feedwater system (TS 3.7.5), component cooling water system (TS 3.7.7), saltwater cooling system (TS 3.7.8), emergency chilled water (TS 3.7.10), control room emergency air cleanup system (TS 3.7.11), and fuel handling building post-accident cleanup filter system (TS 3.7.14).

Following receipt of the NRC interpretation of this Action statement it is SCE's intention to incorporate this into the Bases for Technical Specification B.2.

If you have any questions regarding this request, please let me know.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. L. Rainey". The signature is written in dark ink and is positioned below the typed name "J. L. Rainey".

cc: E. W. Merschoff, Regional Administrator, NRC Region IV  
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV  
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3  
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3