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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
San Onofre Nuclear Generating Station  
Units 2 and 3

The purpose of this letter is to respond to USNRC Generic Letter 87-06, Periodic Verification of Leak Tight Integrity of Pressure Isolation Valves, dated March 13, 1987. The generic letter sought to verify the methods, if any, by which each operating reactor licensee is assuring the leak-tight integrity of all pressure isolation valves (PIVs) as independent barriers against abnormal leakage, rapidly propagating failure and gross rupture of the reactor coolant pressure boundary (RCPB). Accordingly, licensees were requested to submit a list of all pressure isolation valves in the plant. A description of the periodic tests or other measures performed to assure the integrity of the valve as an independent barrier at the RCPB along with the acceptance criteria for leakage, if any, operational limits, if any, and frequency of test performance was requested for each valve. The generic letter went on to state that if the current plant Technical Specifications require leak rate testing of all of the PIVs in the plant, a reply to that effect will be sufficient.

San Onofre Units 2 and 3 Technical Specification 3.4.5.2, Reactor Coolant System (RCS) Operational Leakage, includes surveillance requirements for the RCS PIVs. Surveillance 4.4.5.2.2 requires that each RCS PIV listed in Table 3.4-1 be demonstrated OPERABLE by verifying valve leakage to be within its limits at the times and conditions specified. It should be noted that Technical Specification Table 3.4-1, enclosed for your information, does not contain all of the PIVs in the plant. In accordance with the discussions with NRC at the time the Technical Specifications were drafted, this table does not include those valves which are not operated during RCS operation and valves on lines which are orificed down in size or valves in piping whose failure could be made up by the use of one charging pump. Additionally, the table of PIVs also specifically excludes the valves associated with the charging (CVCS) and

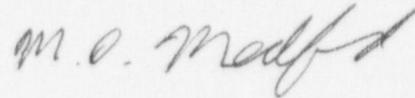
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letdown systems. However, SCE believes that the existing Technical Specification table meets the intent of the generic letter in that leak rate testing is required on those valves of interest and further information need not be submitted.

If you have any questions, please contact me.

Very truly yours,



Enclosure

cc: H. Rood, NRR Senior Project Manager, San Onofre Units 2 and 3  
J. B. Martin, Regional Administrator, NRC Region V  
F. R. Huey, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3