SOUTHERN CALIFORNIA
EDISON
An *EDISON INTERNATIONAL*SM Company

Dwight E. Nunn
Vice President

March 14, 2002

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

Subject: **Docket Nos. 50-361 and 50-362**
Proposed Technical Specification Change Number NPF-10/15-519
Ventilation Filter Testing Program Clarification
San Onofre Nuclear Generating Station Units 2 and 3

Reference: Letter dated October 24, 2001 from D. E. Nunn (SCE) to Document Control Desk (USNRC). Subject: Docket Nos. 50-361 and 50-362 Supplement 1 to Proposed Technical Specification Change Number NPF-10/15-519, Ventilation Filter Testing Program Clarification, San Onofre Nuclear Generating Station Units 2 and 3

Gentlemen:

This letter provides additional information in response to a request from the NRC staff regarding in-place testing of HEPA filters. This information, which is provided in Enclosure 1, is in support of Southern California Edison's Proposed Change 519, regarding the Ventilation Filter Testing Program.

If you have any questions regarding these amendment applications, please contact me or Mr. Jack L. Rainsberry (949) 368-7420.

Sincerely,

Enclosure

cc:
E. W. Merschoff, Regional Administrator, NRC Region IV
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3
L. Raghavan, NRC Project Manager, San Onofre Units 2 and 3
S. Y. Hsu, Department of Health Services, Radiologic Health Branch

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN, CALIFORNIA EDISON COMPANY, ET AL. for a class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 2 of the San Onofre Nuclear Generating Station	Docket No. 50-361 Response to Request for Additional Information

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10CFR50.90, hereby submit additional information in support of Amendment Application No. 202. This amendment application consists of Proposed Change No. PCN-519, Supplement 1.

State of California
County of San Diego

Subscribed and sworn to (or affirmed) before me this 14th day of March, 2002.

By: _____
Dwight E. Nunn
Vice President

_____
Notary Public

MARIANE SANCHEZ
Commission #1196482
Notary Public - California
San Diego County
My Comm. Expires Oct 14, 2002

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN, CALIFORNIA EDISON COMPANY, ET AL. for a class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 3 of the San Onofre Nuclear Generating Station	Docket No. 50-362 Response to Request for Additional Information

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10CFR50.90, hereby submit additional information in support of Amendment Application No. 187. This amendment application consists of Proposed Change No. PCN-519, Supplement 1.

State of California
County of San Diego

Subscribed and sworn to (or affirmed) before me this 14th day of March, 2002.

By: _____
Dwight E. Nunn
Vice President

MARIANE SANCHEZ
Commission #1196482
Notary Public - California
San Diego County
My Comm. Expires Oct 14, 2002

_____
Notary Public

Enclosure 1

Additional Information in Support of PCN-519, Supplement 1

The PACU units filter testing sample point locations were qualified per ANSI N510-1975 which was the standard during plant construction. In accordance with ANSI N510-1975, the filter testing downstream sample points can be qualified downstream of a fan or auxiliary blower, upstream of the fan with verification of adequate mixing, multiple sampling technique, or individual filter shroud testing. For the PACU units, during the original plant startup testing the current sampling points were qualified upstream of the fan with adequate mixing verified per ANSI N510-1975. Tests performed in accordance with either ANSI N510-1975 or ASME N510-1989 provide satisfactory testing for leakage of the installed HEPA filters. Both ANSI N510-1975 and ASME N510-1989 have identical acceptance criteria for filter testing. Since the testing equipment at SONGS is designed to use ANSI N510-1975,and the testing methodology provided in either ANSI N510-1975 or ASME N510-1989 can be used to demonstrate the adequacy of the installed filters to meet the acceptance criteria, the current sample point remains a valid point and provides filter testing results which support the design bases for this system.