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 AUTH. NAME AUTHOR AFFILIATION
 DRAKE, J.H. SOUTHERN CALIFORNIA EDISON CO.
 RECIP. NAME RECIPIENT AFFILIATION
 BAAER, R.L. LIGHT WATER REACTORS BRANCH 2

SUBJECT: FORWARDS AMEND 14 TO FSAR. REQUESTS EXEMPTION FROM FRACTURE TOUGHNESS REQUIREMENTS, REACTOR VESSEL SURVEY REQUIREMENTS & PRIMARY REACTOR CONTAINMENT LEAKAGE TESTING FOR WATER-COOLED POWER PLANTS.

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MEMORANDUM FOR: TERA Corp.

FROM: US NRC/TIDC/Distribution Services Branch

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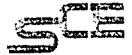
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P. O. BOX 800

2244 WALNUT GROVE AVENUE

ROSEMEAD, CALIFORNIA 91770

J. H. DRAKE
VICE PRESIDENT

March 13, 1979

TELEPHONE
213-572-2258

Director of Nuclear Reactor Regulation
Attention: Mr. Robert L. Baer, Chief
LWR Branch 2, DPM
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

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

Enclosed are sixty-three copies of Amendment No. 14 to the Final Safety Analysis Report (FSAR) for the San Onofre Nuclear Generating Station, Units 2 and 3, operating license applications. This amendment contains responses to all remaining questions forwarded by the NRC's letters of July 26, August 18, and September 20, 1978, except questions 221.13, 312.36, 312.42 and 212.151. This amendment also provides information to satisfy several of the commitments made in the FSAR in Docket Nos. 50-361 and 50-362, and contains miscellaneous corrections, clarifications, and additions to FSAR information.

In accordance with the provisions of 10 CFR 50.12 applicants request exemption from the following requirements:

I. 10 CFR 50 Appendix G - Fracture Toughness Requirements

The specific exemptions requested are identified in Table 121.13-1 of the response to NRC question 121.13, included in Amendment 14 of the San Onofre Units 2 and 3 FSAR. It should be noted that the Applicants' position is consistent with the recommendations of Materials Engineering Branch (MTEB) technical position MTEB 5-2, Fracture Toughness Requirements for Older Plants, which meet the intent of Appendix G.

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II. 10 CFR 50 Appendix H - Reactor Vessel Material Surveillance Program Requirements

Appendix H requires that "Surveillance capsules containing the surveillance specimens shall be located near but not attached to the inside vessel wall in the beltline region . . ."

Applicants' surveillance program allows for the attachment of surveillance capsules to the inside wall of the beltline region of the reactor vessel. Further clarification is provided in response to NRC question 121.14 included in Amendment 14 of the San Onofre Units 2 and 3 FSAR.

III. 10 CFR 50 Appendix J - Primary Reactor Containment Leakage Testing for Water-Cooled Power Plants

1. Appendix J states that for Type B tests, "Air locks shall be tested at 6-month intervals. However, air locks which are opened during such intervals shall be tested after each opening."

The Applicants' program allows for testing of air locks at 6-month intervals. When entry is required during the testing interval, a test will be done to ensure its integrity. However, when multiple openings occur, (such as during a refueling) the door shall be tested every three days.

2. Appendix J also states that "Type C tests mean tests intended to measure containment isolation valve leakage rates . . . valves that are required to operate intermittently under post accident conditions."

Applicants do not propose to perform Type C test of LPSI and HPSI containment spray penetrations (penetration numbers 3, 5, 39, 41, 48, 49, 50 and 51). Because as long as one LPSI or one HPSI pump is in operation post-LOCA, there would be a pressure in excess of the peak containment pressures at these penetrations preventing leakage.

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It should be noted that these exemptions are consistent with the proposed changes to Appendix J identified in an internal NRC letter dated May 24, 1978 from E. Case to R. Minogue.

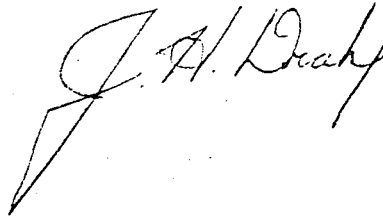
Further clarification regarding these exemptions to Appendix J is provided in response to NRC question 022.25 included in Amendment 14 to the San Onofre Units 2 and 3 FSAR.

It should also be noted that the applicants are in strict compliance with all areas of 10 CFR 50 Appendices G, H, and J except as identified above. The Applicants maintain that the exemptions requested will not endanger life or property or jeopardize the health and safety of the general public.

Direct distribution of the amendment will be made in accordance with the revised service list provided by SCE's letter of December 20, 1978 to the Commission. An affidavit attesting to the fact that distribution has been completed will be provided within ten days of amendment docketing.

If you have any questions or comment concerning the information contained in this amendment, please contact me.

Sincerely,



Enclosures