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 AUTH. NAME: AUTHOR AFFILIATION  
 MEDFORD, M.O. Southern California Edison Co.  
 RECIP. NAME: RECIPIENT AFFILIATION  
 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Requests concurrence re mod to FSAR Table 14.2-2A concerning power ascension testing sequence, of 100% power plateau test program, per 830729 ltr, to eliminate need for addl plant trip.

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*Southern California Edison Company*

**SCE**

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M.O. MEDFORD  
MANAGER, NUCLEAR LICENSING

October 19, 1983

TELEPHONE  
(213) 572-1749

Director, Office of Nuclear Reactor Regulation  
Attention: Mr. George W. Knighton, Branch Chief  
Licensing Branch No. 3  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Gentlemen:

Subject: Turbine Trip Test  
Docket No. 50-362  
San Onofre Nuclear Generating Station  
Unit 3

License Condition 2.C(16) of Facility Operating License NPF-15 for San Onofre Unit 3 requires that SCE conduct the post-fuel loading initial test program set forth in Section 14 of the San Onofre Units 2 and 3 FSAR without making any major modifications to the test program unless such modifications have been identified and have received prior NRC approval.

The purpose of this letter is to obtain your concurrence regarding a modification to Table 14.2-2A, Power Ascension Testing Sequence, of the FSAR relative to the 100% power plateau test program. SCE plans to remove the 100% power turbine trip test from the Power Ascension Testing Sequence. Instead, the 100% load rejection trip test will be conducted as planned and the startup test report will verify that all generator trips directly initiate a turbine trip. Approval of this request was previously granted for Unit 2 in a letter from George W. Knighton (NRC) to Robert Dietch (SCE) dated July 29, 1983.

The objectives, prerequisite test conditions, and test methods stated in FSAR Sections 14.2.12.93 (Turbine Trip Test) and 14.2.12.94 (Unit Load Rejection Test) are identical except for the initiating trip mechanism. In addition, the recommendations in Regulatory Guide 1.68, Appendix A, Sections 5.1.1 and 5.n.n, provide for combining the two tests into one if all generator trips result in a direct turbine trip. When this condition is met, the results of the generator trip bound the results of a turbine trip transient since all generator trips result in a direct turbine trip.

Your concurrence with SCE's position will eliminate the need for an additional plant trip. This is consistent with SCE's philosophy of insuring that the reactor is operated at a high level of safety without any unnecessary challenges to the reactor systems. The current startup schedule for San Onofre Unit 3 indicates the turbine trip test is scheduled for as early as December 1, 1983. Accordingly, your timely approval of the proposed change is requested to support the startup testing program for San Onofre Unit 3.

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Mr. G. W. Knighton

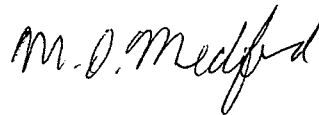
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October 19, 1983

SCE considers that the proposed change does not involve a significant hazard consideration in that it does not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. In addition, it is concluded that: (1) there is a reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (2) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

If you have any questions or comments, please let me know.

Very truly yours,



Enclosure

cc: Mr. H. Rood, Project Manager (Open by addressee only)  
Licensing Branch No. 3  
Mr. A. Chaffee (Site Inspector)