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SUBJECT: Submits results of analyses of programmed enhancements,per
 Generic Ltr 88-17, "Loss of DHR."

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 TITLE: OR/Licensing Submittal: Loss of Residual Heat Removal (RHR) GL-87-12

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cc



Southern California Edison Company

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October 31, 1990

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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
NRC Generic Letter No. 88-17, "Loss of Decay Heat Removal"
Programmed Enhancements (TAC Nos. 69744 and 69745)
San Onofre Nuclear Generating Station
Units 2 and 3

References: 1) Letter, SCE to NRC, Subject, "Docket Nos. 50-361 and
50-362 NRC Generic Letter No. 88-17, 'Loss of Decay
Heat Removal,' San Onofre Nuclear Generating Station
Units 2 and 3," dated May 14, 1990.

2) Letter, NRC to SCE, Subject, "San Onofre Nuclear
Generating Station, Unit Nos. 2 and 3, Programmed
Enhancements for Generic Letter 88-17, "Loss of Decay
Heat Removal," dated May 18, 1990.

The Southern California Edison (SCE) Company has completed analyses to support operation of the San Onofre Nuclear Generating Station, Units 2 and 3, in Modes 5 and 6, while in a mid-loop configuration. The analyses were performed in response to the Programmed Enhancement recommendations specified in NRC Generic Letter No. 88-17, "Loss of Decay Heat Removal."

Overall conclusions reached by SCE to further enhance plant safety during mid-loop operation can be summarized in the following three areas:

1. Removal of the Shutdown Cooling (SDC) Autoclosure Interlock (ACI).

Combustion Engineering Owners Group analysis results indicate spurious ACI actuation contributes approximately 39% to system unavailability and recommends removal of this design. Submittal of an amendment application to the Units 2 and 3 Operating Licenses will be required prior to removal of the ACI. The amendment application will be required to be submitted consistent with our schedule to implement Generic Letter No. 88-17 plant modifications during each units Cycle 6 refueling outage.

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2. Reducing the likelihood of core uncover.

At mid-loop, with a Reactor Coolant System cold leg opening greater than one square inch that cannot be quickly closed, at least one steam generator hot leg manway must be removed to provide a low-pressure drop vent path during a loss of SDC event. This action represents a change from current procedures which allow such maintenance with only the pressurizer manway removed. Late in an outage, after refueling has been completed, the decay heat load is small enough that the pressurizer manway vent will provide an adequate vent path.

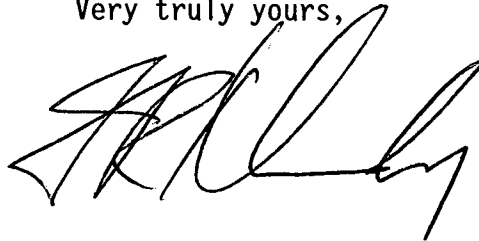
3. Reducing off-site dose consequences in the event of loss of SDC that leads to core uncover and potential fuel damage.

Modified Containment closure requirements are being implemented. These requirements will ensure that Containment integrity can be established prior to core uncover following loss of decay heat removal during reduced inventory operation.

Plant procedure changes, identified above, would be placed in affect prior to each units entry into the Cycle 6 Refueling outage.

Should you have any questions regarding our response in this area, please contact me.

Very truly yours,

A handwritten signature in black ink, appearing to be 'J. B. Martin', written over the typed name 'J. B. Martin'.

cc: J. B. Martin, Regional Administrator, NRC Region V
C. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3