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 50-362 San Onofre Nuclear Station, Unit 3, Southern Californ 05000362

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 RECIP. NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Provides current status of items in App C of SER re  
 inservice testing program for pumps & valves & requests for  
 relief. Revised relief requests for Items 2 & 3 will be  
 provided by 910615.

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April 12, 1991

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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  
Status of NRC Safety Evaluation Report, Appendix C  
Items for the Inservice Testing Program for Pumps and  
Valves  
San Onofre Nuclear Generating Station  
Units 2 and 3

Reference: Safety Evaluation By the Office of Nuclear Reactor  
Regulation Related to the Inservice Testing Program  
and Requests for Relief;  
Issued September 24, 1990  
San Onofre Nuclear Generating Station  
Units 2 and 3

This letter is to provide the NRC with the current status of the items in Appendix C of the referenced Inservice Testing Program (IST) Safety Evaluation Report (SER). Section 2.0 of the SER provided the following guidance in resolving remaining open items:

"The Commission anticipates that the licensee will resolve all items listed in Appendix C within the cited time limits in accordance with staff guidance, specifically: (a) program/procedural changes covered by items 1, 2, 3, 5, and 8 - 16, within six months of receipt of this SER; (b) item 4, by the next refueling outage; and (c) item 6, within one year of receipt of this SER or the next refueling outage, whichever is longer. Item 7 should be actively pursued, and if an alternate testing method is developed, the affected relief requests should be revised or withdrawn."

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Southern California Edison (SCE) received the SER on October 12, 1990, therefore, the program/procedural items identified in (a) above are due on April 12, 1991. Items 1, 5, 8, 9, 11, 12, 13, 14, and 16, have been resolved with procedure/program changes as requested. Pump Relief Requests (PRR) Nos. 1 and 8, and Valve Relief Request (VRR) No. 19, corresponding to Items 1, 5, and 11, respectively, are hereby withdrawn.

Regarding Item 10 (VRR Nos. 2 and 12) and Item 6 (VRR Nos. 3, 11, and 13), the feasibility of the testing required by the SER has not yet been determined. SCE will resolve existing questions on the feasibility of testing and provide revised relief requests (if necessary) by June 15, 1991. It is our intention to resolve these issues and complete the program/procedure implementation prior to the next test, which will be performed during the Unit 2 Cycle 6 refueling outage. This outage is currently scheduled to start on August 3, 1991.

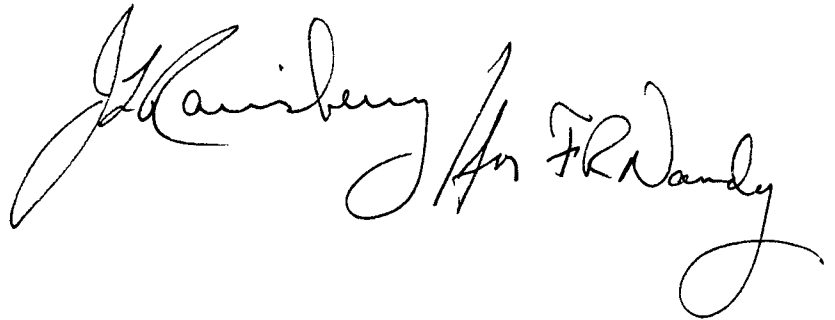
SCE will be providing revised relief requests for Item 2 (PRR No. 3) and Item 3 (PRR No. 10) by June 15, 1991. This submittal will explain why the required testing is impractical. We understand, as stated in the SER, our IST program is not in compliance until the NRC has approved these relief requests. However, we have no alternative but to continue testing the diesel pumps and the salt water cooling pumps with the alternate test method as described in the existing PRR Nos. 3 and 10. Similar relief has been granted at Unit 1 and at other nuclear plants.

In response to Item 15, a justification demonstrating the impracticality of quarterly full stroke testing of main steam valves HV-8204 and HV-8205 has been incorporated in our program. A copy of the justification will be included in the June 15, 1991 submittal for your review.

Relative to (b) of Section 2.0 of the SER, SCE will be in compliance with Item 4 by the next refueling outage. The NRC guidance in Item 7 is being actively pursued so we can revise or withdraw VRR Nos. 18 and 20 once an alternate testing method is available.

The reason for the above delays is the impact of the recent Unit 1 outage on our resources. If you have any questions or would like additional information concerning the inservice testing program, please let me know.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. B. Martin / for FR Wandy". The signature is written in dark ink and is positioned to the right of the "Very truly yours," text.

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