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AUTH. NAME AUTHOR AFFILIATION
NANDY, F.R. Southern California Edison Co.

RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Provides clarification of methods to minimize potential for siphoning of SFP thru purification suction piping.

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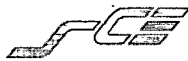
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Southern California Edison Company

23 PARKER STREET
IRVINE, CALIFORNIA 92718

F. R. NANDY
MANAGER OF NUCLEAR LICENSING

July 6, 1990

TELEPHONE
(714) 587-5400

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Spent Fuel Pool Modification to Prevent Siphoning
San Onofre Nuclear Generating Station
Units 2 and 3

- References:
- 1) August 12, 1988 letter, J. B. Martin (NRC) to K. P. Baskin (SCE), Subject: NRC Inspection Report Nos. 50-361/88-15 and 50-362/88-16
 - 2) September 12, 1988 letter, K. P. Baskin (SCE) to Document Control Desk (NRC); Subject: Reply to Notice of Violation and Notice of Deviation
 - 3) November 25, 1988 letter from J. B. Martin (NRC) to K. P. Baskin (SCE); Subject: Systematic Assessment of Licensee Performance
 - 4) Licensee Event Report No. 88-017, Revision 1

The purpose of this letter is to clarify our methods to minimize the potential for siphoning of the San Onofre Units 2 and 3 Spent Fuel Pools (SFPs) through the purification suction piping. This clarification is considered necessary because a statement was made in Reference 3 that vacuum breakers will be installed in this piping.

On June 22, 1988, it was determined by Southern California Edison (SCE) that following drain down of the Unit 3 reactor cavity approximately 9,000 gallons of water had been inadvertently drained from the SFP into the reactor cavity because a siphon had been established. This event was reviewed by the NRC during a routine inspection, and a Notice of Deviation was issued to SCE by Reference 1. In the response to the Notice of Deviation (Reference 2), SCE committed to complete corrective actions "to determine the feasibility and cost of a change to the system design to physically preclude the establishment of a siphon."

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SCE has finished the evaluation of this event and has decided to remove the SFP purification system suction piping below the Technical Specification 3.9.11 minimum pool water level limit. This will ensure that the spent fuel pool cannot be drained through the SFP purification piping. Therefore, vacuum breakers are not necessary and they will not be installed on this piping. Additional discussions of all the corrective actions SCE has taken in regard to this issue can be found in Reference 4.

If you have any questions or need additional information, please let me know.

Very truly yours,



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