

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9111250088 DOC. DATE: 91/11/20 NOTARIZED: NO DOCKET #
 FACIL: 50-361 San Onofre Nuclear Station, Unit 2, Southern California 05000361
 50-362 San Onofre Nuclear Station, Unit 3, Southern California 05000362

AUTH. NAME AUTHOR AFFILIATION
 ROSENBLUM, R.M. Southern California Edison Co.
 RECIP. NAME RECIPIENT AFFILIATION

Document Control Branch (Document Control Desk)

SUBJECT: Documents completion of installation of diverse emergency
 feedwater actuation sys on Unit 2 in compliance w/ATWS rule.

DISTRIBUTION CODE: A055D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3
 TITLE: OR/Licensing Submittal: Salem ATWS Events GL-83-28

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD5 LA	1 0	PD5 PD	1 1
	KOKAJKO, L.	2 2		
INTERNAL:	ACRS	6 6	NRR/DEST/ESB 8D	1 1
	NRR/DLPQ/LPEB10	1 0	NRR/DOEA/OGCB11	1 0
	NRR/DST/SICB8H3	1 1	NRR/DST/SPLB 8D	1 0
	OC/LFMB	1 0	OGC/HDS3	1 0
	REG FILE 01	1 1	RES/DSIR/EIB	1 1
EXTERNAL:	NRC PDR	1 1	NSIC	1 1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 21 ENCL 15

MR. [Signature]



Southern California Edison Company

23 PARKER STREET
IRVINE, CALIFORNIA 92718

November 20, 1991

R. M. ROSENBLUM
MANAGER OF
NUCLEAR REGULATORY AFFAIRS

TELEPHONE
(714) 454-4505

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
ATWS Rule - 10 CFR 50.62 (TAC No. M59139/40)
Diverse Emergency Feedwater Actuation
San Onofre Nuclear Generating Station
Units 2 & 3

- References:
1. December 5, 1989 letter from F. R. Nandy (SCE) to Document Control Desk (NRC); Subject: ATWS Rule (10 CFR 50.62), Diverse Emergency Feedwater Actuation, San Onofre Nuclear Generating Station, Unit 3.
 2. January 30, 1990 letter from Lawrence E. Kokajko (NRC) to Harold B. Ray (SCE); Subject: Safety Evaluation Report regarding compliance with the ATWS Rule, 10 CFR 50.62 for San Onofre Nuclear Generating Station, Unit Nos. 2 and 3.
 3. December 29, 1988 letter from L. T. Papay (SCE) to Document Control Desk (NRC); Subject: ATWS Rule (10CFR50.62) Exemption Request, San Onofre Nuclear Generating Station, Units 2 and 3.
 4. November 8, 1991 letter from R. M. Rosenblum (SCE) to J. B. Martin (NRC); Subject: Request for Extension of Temporary Waiver of Compliance, Reactor Coolant Pump Flywheel Inspection, San Onofre Nuclear Generating Station, Unit 3.

This letter documents completion of the installation of the Diverse Emergency Feedwater Actuation System (DEFAS) on San Onofre Unit 2 in compliance with the Anticipated Transient Without Scram (ATWS) rule. This letter also documents deferral of installation of the DEFAS on San Onofre Unit 3 as discussed during a telephone conversation with the NRC Project Manager for San Onofre Units 2 and 3 on November 18, 1991.

9111250088 911120
PDR ADDCK 05000261
F PDR

1055 1/0

In reference 1 Southern California Edison (SCE) committed to install DEFAS in Unit 2 during the Unit 2 Cycle 6 refueling outage, and to install DEFAS in Unit 3 immediately after the return to service of Unit 2 from the Cycle 6 refueling outage. This schedule was accepted by the NRC in reference 2. Unit 2 DEFAS installation was completed during the current Unit 2 refueling outage. During the May/June 1991 forced outage of Unit 3, SCE took the initiative to install some of the outage related portions of the Unit 3 DEFAS permitted by the length of the outage.

In accordance with the commitment in Reference 1, SCE's plans would have been to start up Unit 2 (presently scheduled for about November 20), then allow about 2 weeks for plant operation to stabilize and any anomalies from the outage to be resolved. Unit 3 would then be shut down (about December 7*) for between 30 and 60 days for installation of DEFAS; resume operation for about six weeks; and then shut down again for refueling. Because we believed that a DEFAS shutdown with only six weeks of operation remaining was not warranted, we discussed with the NRC further deferring installation of the Unit 3 DEFAS until the Unit 3 Cycle 6 refueling outage, which is scheduled to start on January 18, 1992, but no later than January 31, 1992. Although the outage is scheduled for January 18, the additional time to January 31 allows for small unforeseeable changes to this schedule. The NRC concurred with this deferral during a telephone conversation on November 18, 1991.

We conclude that the approximate 6 week deferral (maximum 8 weeks) for installing DEFAS on Unit 3 does not have any adverse safety significance. This conclusion is based on the following:

1. Previous evaluations performed by SCE (Reference 3) have concluded that virtually all of the ATWS risk reduction that could be obtained by full compliance with the ATWS rule is obtained by installing the Diverse Scram System (DSS). SCE installed the DSS, and associated Diverse Turbine Trip (DTT), on Units 2 and 3 during the Cycle 5 refueling outages.
2. The existing EFAS already contains sensors, bistable relays, and actuation devices that are diverse from the DSS as outlined in Reference 3. This system provides a high degree of protection during the projected deferral period.

* It is noted that SCE is currently operating under a waiver of compliance until December 1, 1991 associated with reactor coolant pump motor flywheels. By Reference 4 SCE has requested that this waiver be extended until the refueling outage.

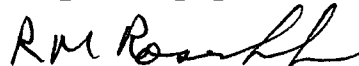
3. The potential for an ATWS event during the projected deferral period is considered to be very remote.

Installation of DEFAS on Unit 3 would require an outage of about 30 to 60 days, depending on the amount of additional work that can be accomplished with the unit at power prior to the outage. SCE would incur the additional replacement energy costs during this outage. In addition, Unit 3 would experience an unnecessary increase in plant risk associated with an unwarranted shutdown and restart of the unit.

In summary, the Unit 2 installation of DEFAS was completed as scheduled. The Unit 3 DEFAS installation will be deferred until the Unit 3 Cycle 6 refueling outage, which is scheduled to start on January 18, 1992, but no later than January 31, 1992. For the reasons listed above, we conclude that this deferral has no adverse safety significance.

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

Very truly yours,



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