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

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SUBJECT: Forwards recommendations for panel discussion topics & names of personnel attending & willing to be panel members, in response to NRC 920504 ltr re current licensing basis workshop.

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Southern California Edison Company

23 PARKER STREET
IRVINE, CALIFORNIA 92718

R. M. ROSENBLUM
MANAGER OF
NUCLEAR REGULATORY AFFAIRS

TELEPHONE
(714) 454-4505

May 20, 1992

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

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362
Current Licensing Basis Workshop
San Onofre Nuclear Generating Station
Units 2 and 3**

Reference: Letter, Mel B. Fields (NRC) to Mr. Harold B. Ray, "Current
Licensing Basis Workshop", dated May 4, 1992

This letter responds to the referenced letter regarding an upcoming NRC
Current Licensing Basis (CLB) Workshop. As requested by the referenced
letter, enclosed are recommendations for panel discussion topics and the names
of personnel who will attend and are willing to be panel members.

If you have questions or require any further information, please let me know.

Very truly yours,

Enclosure

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

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ENCLOSURE

1. SCE PARTICIPANTS IN NRC CLB WORKSHOP

Rick Ornelas, Plant Licensing Manager*
Gregory T. Gibson, Supervisor, Generic Licensing Section*

*Willing to participate as a panel member.

2. SUGGESTED TOPICS FOR NRC CLB WORKSHOP

- CURRENT LICENSING BASIS LEVEL OF DETAIL. What is the level of detail required for the CLB? In developing a tool that searches for a CLB document, how much effort should be expended to ensure that no pertinent documents on a CLB subject have been overlooked (i.e., 100% verification by comparing public docket file and licensee file)? Also, what is the acceptable accuracy of the electronic data base (i.e., 99.5%)?
- CONSTRUCTING THE CLB. Depending on the level of detail expected, constructing the entire CLB from the initial licensing date to the present could be costly. Could a "build as you go" approach to CLB be implemented in which the utility program reconstructs information on an as needed basis? Would it be acceptable to only go back 10 years?
- OPERABILITY, FULL QUALIFICATION, AND CLB. Generic Letter 91-18 has defined Full Qualification in Section 5.2 as "...conforming to all aspects of the current licensing basis, including codes and standards, design criteria, and commitments." The generic letter also recognizes in Section 5.3 "...the fact that a system is not fully qualified does not, in all cases, render that system unable to perform its safety function if called upon." What is the relationship of Operability, Full Qualification, and CLB, and when does a condition fall under Operability or Full Qualification?