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SUBJECT: Provides justification re util position for not considering
 loss of offsite power concurrent w/fire. Util continuing
 efforts to finalize current App R analyses & prepare
 submittals to facilitate review of plant fire protection.

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March 13, 1987

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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
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Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station, Units 2 and 3

A number of meetings and telephone conversations have recently been conducted between Southern California Edison Company (SCE) and the Nuclear Regulatory Commission (NRC) Office of Nuclear Reactor Regulation (NRR) to discuss 10 CFR 50, Appendix R analyses being conducted by SCE. These analyses are being performed for San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 and 3) in light of the recent Appendix R/fire protection guidance provided by Generic Letter 86-10. The latest meeting, held February 3 and 4, 1987, focused primarily on the methodology utilized to perform the analyses and the various types of results which are now in the final completion stage.

One issue requiring resolution prior to final completion is consideration of a Loss of Offsite Power (LOOP) concurrent with a design basis fire. NRR had previously informed SCE that SCE's position to not assume a LOOP concurrent with a fire was not consistent with NRC policy on this issue and, therefore, is not acceptable. SCE agreed to provide NRR with a written response as to whether we would continue to pursue the LOOP deviation submitted on the docket in March 1984 or proceed to analyze SONGS 2 and 3 for LOOP concurrent with a fire.

A related topic of compensatory measures for fire protection deficiencies was discussed in a conference call with NRC Region V in conjunction with the February 3 and 4, 1987 meeting. The Region inspectors expressed concern that, should SCE decide to not pursue the LOOP deviation, the subject of appropriate compensatory measures should be considered. Therefore, in conjunction with the written response to NRR, SCE also agreed to address the subject of compensatory measures.

SCE's original basis for not considering a LOOP concurrent with a fire was the low probability of a LOOP as a result of the demonstrated high reliability of the San Onofre offsite power grid. Furthermore, statements appearing in the original Safety Evaluation Report regarding SCE's compliance with Section III.L of Appendix R led SCE to believe adequate justification existed to support the deviation.

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SCE still considers its technical basis for not including a LOOP concurrent with a fire in its original analysis remains sound. However, past industry practice regarding LOOP deviations and conversations with NRR regarding the unacceptability of SCE's position, indicate that the NRC views LOOP deviations more as a policy issue than a technical issue. SCE, therefore, has decided to analyze for a LOOP concurrent with a fire in accordance with this policy, as well as to facilitate the completion of NRR's review of outstanding Appendix R/fire protection issues.

Results of the current Appendix R analyses, incorporating the revised LOOP criteria, indicate that the impact on design associated with protecting diesel generator (DG) cable/circuitry, would not be as significant as originally presumed. The current projections of design impact are based upon expected NRR acceptance of as built, redundant DG cable separation in fire area 142 of both Units 2 and 3. The technical details of safe shutdown for this fire area have been previously discussed with the NRR reviewer.

Because SCE considers the technical basis for the original analysis to be sound and is re-analyzing for a LOOP concurrent with a fire in accordance with NRC policy, establishment of compensatory measures for any deficiencies that may be identified, is not appropriate. SCE believes this to be consistent with previous instances where operating units are re-evaluated as a result of evolving regulatory requirements; e.g., re-evaluation of safety features after NRC issuance of the TMI Action Plan, NUREG-0660/0737.

SCE is expeditiously continuing efforts to finalize the current Appendix R analyses and prepare submittals to facilitate completion of NRR's review of the SONGS 2 and 3 fire protection docket. As previously agreed upon in the February 3 and 4, 1987 meeting, SCE will submit the appropriate Appendix R compliance reports and analysis documentation by April 30, 1987. These submittals will be accompanied by a revised set of deviation requests for NRR review based on the Appendix R analysis results. SCE will also be prepared at that time to address the schedule for implementation of modifications necessary to revise the SONGS 2 and 3 Appendix R design basis as a result of the current analyses.

If you have any questions regarding this or other Appendix R/fire protection matters, please contact me.

Very truly yours,



JWM:8222F:9685u

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