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 AUTH. NAME AUTHOR AFFILIATION
 MEDFORD, M. O. Southern California Edison Co.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards compensatory measures util will implement for
 identified App R deficiencies & proposed implementation
 schedule for instituting measures. Ltr supersedes util 870313
 ltr re compensatory measures for loss of offsite power.

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NOTES: ELD Chandler 1cy. 05000361
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Southern California Edison Company

P. O. BOX 800

2244 WALNUT GROVE AVENUE

ROSEMEAD, CALIFORNIA 91770

M. O. MEDFORD
MANAGER OF NUCLEAR ENGINEERING
AND LICENSING

May 8, 1987

TELEPHONE
(818) 302-1749

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

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 been recently 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 conducted by SCE. These analyses have been performed for San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 and 3) in light of the latest NRC Appendix R/fire protection guidance provided by Generic Letter 86-10. The latest meeting, held April 16, 1987, focused on the level of detail SCE should provide for proposed Appendix R deviation requests and other issues pertaining to SONGS 2 and 3 Appendix R compliance.

The status of SCE's submittals to document the results of the Appendix R analysis was also discussed as part of the April 16, 1987 meeting. Although SCE had originally expected to transmit this information to the NRC by April 30, 1987, due to the complexity of the analyses, a revised date for submittal of May 31, 1987 was proposed by SCE. This new date for submittal was acceptable to the NRC; however, the NRC requested a separate submittal addressing the issue of interim compensatory measures (to be implemented until identified Appendix R deficiencies are resolved).

To fully assess the need for compensatory measures and their adequacy, SCE performed a review of the identified Appendix R deficiencies. In this review, SCE determined appropriate compensatory measures based on each type of deficiency. This review included the results of the Appendix R re-analysis which had incorporated the criteria for a loss of offsite power concurrent with a fire. This letter essentially supersedes our March 13, 1987 letter regarding compensatory measures for a loss of offsite power concurrent with a fire.

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Based on SCE's review, compensatory measures identified in the Enclosure will be implemented for identified Appendix R deficiencies. Also included in the Enclosure is SCE's proposed implementation schedule for instituting the described compensatory measures. Note that the only types of compensatory measures which cannot be immediately implemented are those measures associated with operating procedure changes and temporary modifications to support such changes or maintenance (repair) instructions and subsequent training thereon. In order to provide compensatory measures while these are being revised, roving fire watches will be utilized in the interim in those areas for which SCE expects to utilize repairs or operator actions as compensatory measures.

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

Very truly yours,

M. O. Medford

Enclosures

cc: H. Rood, NRR Senior Project Manager, San Onofre Units 2 and 3
J. B. Martin, Regional Administrator, NRC Region V
F. R. Huey, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3
D. J. Kubicki, NRC Staff

Deficiency Type	Compensatory Measure	Implementation Schedule	Remarks	
III.G.1 (Non fire area specific)				
1. Repair of hot shutdown equipment (to be "free of fire damage").	Maintenance repair instruction	June 15	Applies only to CCW Surge Tank level indication (local)	Note 1
2. Repair of cold shutdown equipment.	Maintenance repair instruction	June 15	Applies only to Shutdown Cooling (SDC) flow and temperature indication (local)	Note 1
3. Power lockout of valves	Rackout breakers	June 15	Operating instructions will be revised to reflect breakers as normally open. This applies to Pzr. Aux. Spray, SDC and CCW valves.	Note 1
4. Communication	Temporary Modification	July 1	Temporary sound powered phones will be provided for essential operator actions necessary for alternative shutdown. A spool of communications cable will also be supplied to aid in any potential communications problems for the fire brigade.	

Deficiency Type	Compensatory Measure	Implementation Schedule	Remarks
III. G.2 Separation			
1. With detection and automatic suppression.	Existing fire protection features	May 8	Note 2
2. Without detection and/or automatic suppression.	Hourly fire watch	May 8	Note 3
III.G.3 Separation			
1. With detection and automatic suppression.	Hourly fire watch	May 8	Note 4
2. Without detection and/or automatic suppression.	Continuous manning in Control Room, Detection in other portions of Control Room envelope	May 8	Applies to Control Room envelope only. Note 5
III.J (Non fire area specific)			
Emergency Lights	Use of portable lanterns	June 15	Lanterns will be available to perform required actions Note 6

NOTES

1. This compensatory measure would be utilized for safe shutdown for a fire in any area.
2. Since detection and automatic suppression are installed and separation exists between redundant safe shutdown trains (less than 20 feet), the existing configuration will minimize a potential fire to prevent damage to more than one train in the fire area.
3. Since detection and/or automatic suppression are not installed, but separation exists between redundant safe shutdown trains (less than 20 feet), in order to supplement the existing configuration to minimize a potential fire to prevent damage to more than one train in the fire area, an hourly fire watch will be instituted for these fire areas.
4. Since detection and automatic suppression are installed and separation exists both between redundant safe shutdown trains and the alternative shutdown capability (less than 20 feet), the existing configuration will minimize a potential fire to prevent damage to more than one train in the fire area. However, since these areas are associated with alternative shutdown and are, therefore, more critical than other areas, an hourly fire watch will be instituted for these fire areas to further minimize the potential damage from a fire.
5. Since the control room is continuously manned and other portions of the control room envelope are provided with detection, a fire would be detected quickly and the extent of the damage would be limited. Separation between normal and alternative shutdown capability (less than 20 feet) exists such that, by minimizing the extent of the fire, the damage would be limited to one train. In the unlikely event that control room habitability is compromised, access could be gained within an acceptable time frame (i.e. 90 minutes) to continue monitoring the safe shutdown process.
6. Portable lanterns would be utilized for post-fire safe shutdown in the event of a concurrent loss of offsite power.