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SUBJECT: Informs that util completely satisfied License Condition
 2. C(19), Items i, q & r re small-break LOCA.

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May 21, 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
Resolution of Small-Break LOCA Operating License Conditions
San Onofre Nuclear Generating Station
Units 2 and 3

- References:
1. Combustion Engineering Report, "Response to NRC Request for Additional Information for Verification of Analysis Methods for Small Break LOCA's," CEN-203, Revision 1-P, Supplement 4, dated November 1986
 2. February 11, 1987 letter from Dennis M. Crutchfield (NRC) to Dr. J. K. Gasper, Chairman, Combustion Engineering Owners Group; Subject: Acceptance for Referencing of Licensing Topical Report

The purpose of this letter is to inform the Nuclear Regulatory Commission (NRC) that Southern California Edison (SCE) has completely satisfied the following San Onofre Units 2 and 3 Facility Operating License Conditions:

1. Unit 2 License NPF-10, Condition 2.C(19) - Item q., Revised Model for Small-Break LOCAs (II.K.3.30)
2. Unit 2 License NPF-10, Condition 2.C(19), Item r. and Unit 3 License NPF-15, Condition 2.C(17), Item i., both entitled Plant-Specific Calculations for Compliance with 10 CFR 50.46 (II.K.3.31)

The final step to complete Unit 2 License Condition 2.C(19), Item q., is satisfied by hereby incorporating in the San Onofre Units 2 and 3 dockets Reference 1 which provided the final verification analyses requested by the NRC concerning this license condition.

As stated in Section 3.0, CONCLUSION, of the NRC Safety Evaluation Supplement attached to Reference 2, the NRC staff has completed its review of and accepted for referencing on CE plant dockets Reference 1 for resolving TMI Action Item II.K.3.30. Based on Reference 2, it is our understanding that the NRC does not intend to repeat the review of the matters described in Reference 1, except to assure that the material presented is applicable to San Onofre Units 2 and 3. Reference 1 was developed to complete the verification

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that the existing CEFLASH-4AS model is applicable for performing small-break LOCA licensing evaluations. This CEFLASH-4AS model was used for the San Onofre Units 2 and 3 licensing evaluations. Therefore, based on the above, the Reference 1 material is applicable to San Onofre Units 2 and 3, and SCE hereby concludes that License Condition 2.C(19), Item q. has been completely satisfied with no outstanding conditions to be addressed by SCE in the future. To complete formal documentation procedures established in NUREG-0390, as requested by the NRC in Reference 2, it is our understanding that the CEOG will publish by August 1, 1987 an accepted version of the complete CEN-203, Revision 1-P report which will include Reference 2.

Because NPF-10 License Condition 2.C(19), Item q. has been resolved by justification of the small-break LOCA model as discussed above, performance of plant specific small-break LOCA analyses, per Unit 2 License Condition 2.C(19) Item r. and Unit 3 License Condition 2.C(17) Item i., will no longer be required. Final resolution of these two License Conditions was documented in Section 3.0 CONCLUSION of the NRC Safety Evaluation Supplement attached to Reference 2.

Accordingly, SCE hereby concludes that, in addition to NPF-10 License Condition 2.C(19), Item q., NPF-10 License Condition 2.C(19), Item r. and NPF-15 License Condition 2.C(17), Item i. are also completely satisfied with no outstanding conditions to be addressed in the future.

Please let me know if you have any questions concerning the above.

Very truly yours,



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