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SUBJECT: Forwards response to 870306 request for addl info to  
 facilitate NRC review of Generic Ltr 83-28, "Required  
 Actions Based on Generic Implications of Salem ATWS Events."

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June 18, 1987

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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

By letter dated March 6, 1987, the NRC requested additional information to facilitate NRC review of Southern California Edison Company's response to USNRC Generic Letter 83-28, Required Actions Based On Generic Implications of Salem ATWS Events. The purpose of this letter is to transmit the requested information to the NRC which is provided as an enclosure to this letter.

If you have any questions, please contact me.

Very truly yours,

Enclosure

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

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SOUTHERN CALIFORNIA EDISON COMPANY RESPONSE  
REQUEST FOR ADDITIONAL INFORMATION  
ITEMS 2.1 (PART 2), 2.2 (PART 1) AND 4.5.2 OF GENERIC LETTER 83-28  
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

NRC Staff Requests

Review of the licensee's responses dated November 29, 1983 and October 2, 1985 for Items 2.1 (Part 2), 2.2 (Part 1) and 4.5.2 of Generic Letter 83-28, discloses the need for additional information as follows:

Request

Item 2.1 (Part 2) "Vendor Interface (Reactor Trip System Components)"

Our review of the licensee's submittals indicates that the licensee has identified an interface with their nuclear steam supply system vendor. However, we are unable to determine that the licensee's vendor interface program encompasses a periodic and continuing feedback mechanism. Item 2.1 (Part 2) states that the vendor interface program shall include periodic communication with vendors to assure that all applicable information has been received. The licensee should describe how their program assures that all relevant material is received, properly evaluated, implemented and maintained during the life of the plant.

Response

SCE routinely contacts both Nuclear Steam Supply System (NSSS) suppliers at least twice per year to ascertain the status of technical notices/bulletins. The vendor interface program at San Onofre includes vendor interface through our Operation and Maintenance Support (O&MS) organization. O&MS personnel also routinely review information distributed by INPO through the Nuclear Network system. The Independent Safety Engineering Group (ISEG) reviews and evaluates technical information provided by the NSSS vendors (who periodically publish complete listings of their equipment Technical Bulletins). Personnel are particularly sensitized to items which concern reactor trip breakers. SCE's Corporate Document Management (CDM) provides a formal receiving, tracking, distribution and review process for all receipted technical information. This program is believed to provide reasonable assurance that vendor information pertaining to reactor trip breakers is received, reviewed, evaluated, implemented and maintained during the life of the plant.

Request

Item 2.2 (Part 1) Equipment Classification (Programs For All Safety-Related Components)

1. Item 2.2.1 - Program

The licensee's responses do not confirm that all safety-related components are designated as safety related on plant documents such as procedures, system descriptions, test and maintenance instructions, operating procedures, and in information handling systems so that personnel performing activities that affect such safety-related components are aware that they are working on safety-related components and are guided by safety-related procedures and constraints.

The licensee needs to state that their equipment classification conforms with the above staff position. If all safety-related components are not designated as safety related on the relevant documents, the licensee should specifically describe the exceptions and provide a justification for such exceptions for staff review.

Response

Southern California Edison Company conforms to the above NRC Staff position as described below.

Equipment at San Onofre Units 2 and 3 has been appropriately classified and documented in the San Onofre Maintenance Management System (SOMMS). SOMMS is a computer based system used for the generation of Maintenance Orders (MOs) and equipment failure maintenance history. Equipment classification is an integral element of SOMMS. SOMMS is used to control maintenance activity and identification of safety-related work activity is included in the SOMMS data base.

Procedures that involve safety-related activities are identified as "QA Program Affecting" and appropriate administrative controls are employed. All procedures associated with RTBs are "QA Program Affecting." System descriptions are for "information only" and are not used to control work processes.

Request

2. Item 2.2.1.3 - Use of the Equipment Classification Listing

The licensee's response has not confirmed that criteria and procedures exist which govern the use of the information handling system to determine that an activity is safety-related and what procedures for maintenance, surveillance, parts replacement and other activities defined in the introduction to 10 CFR 50, Appendix B, apply to safety-related components.

The licensee needs to state that their program contains provisions to govern the use of the information handling system to assure that a safety-related activity is identified as safety-related and that the proper procedures are selected and implemented.

Response

Procedures and criteria exist which govern the use of the information handling system to determine that an activity is safety-related. Additionally, a program is in place to identify those procedures used for maintenance and surveillance of safety related equipment.

The Topical Quality Assurance Manual (TQAM) sets forth the policies and general requirements for establishing and implementing the quality assurance program for nuclear generating stations by the Southern California Edison Company in accordance with Nuclear Regulatory Commission regulations. Under the auspices of the TQAM, procedures affecting safety-related systems are specifically designated as "QA Program Affecting."

Maintenance is performed using the San Onofre Maintenance Management System (SOMMS) which contains a validated data base that includes equipment classification. Refer to the above question response.

Request

Item 4.5.2 - Reactor Trip System Reliability (System Functional Testing)

The licensee states that the San Onofre Unit 2 and 3 design allows performance of on-line testing of the Reactor Trip System. However, it is not clear from the responses that the plant is designed to permit independent on-line verification of operability of the reactor trip breaker shunt and undervoltage trip attachments.

The licensee needs to confirm that the plants have the capability to perform on-line independent verification of reactor trip breaker shunt and undervoltage trip attachment operability.

Response

San Onofre Units 2 and 3 are designed to permit independent on-line verification testing of the reactor trip breaker shunt and undervoltage trip attachments. This surveillance is performed in accordance with S023-II-11.161, "Surveillance Requirement Reactor Breakers Undervoltage and Shunt Trip Device Circuit Test."

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