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SUBJECT: Informs that util plans to install diverse scram sys (DSS) during Cycle 5 refueling outages. Reasons include, scheduling, planning, procurement & budgeting changes because DSS not yet approved.

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July 27, 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

- References:
- 1) 10 CFR 50.62, Anticipated Transients Without Scram (ATWS)
Final Rule (49 FR 26036)
 - 2) October 15, 1985 letter from M. O. Medford (SCE) to
George W. Knighton (NRC), Subject: Compliance with ATWS Rule
 - 3) February 9, 1987 letter from M. O. Medford (SCE) to Document
Control Desk (NRC), Subject: Compliance with ATWS Rule

By Reference 2, Southern California Edison (SCE) committed to installation of a Diverse Scram System (DSS) at San Onofre Units 2 and 3 during the first refueling outage which begins after June 1, 1987 (Cycle 4 refueling outages). The commitment to install a DSS during the Cycle 4 refueling outages was based on obtaining approval of the DSS for full compliance with 10 CFR 50.62 (Reference 1).

By Reference 3, SCE informed the NRC that the DSS could not be installed during the Cycle 4 refueling outages unless installation of only the DSS was approved by March 1, 1987. Accordingly, it is now planned to install the DSS in San Onofre Units 2 and 3 during the Cycle 5 refueling outages. The reasons for the current Cycle 5 schedule are the following:

1. The San Onofre Unit 2 Cycle 4 refueling outage is currently scheduled to begin in August 1987, and the Unit 3 Cycle 4 refueling outage could begin as early as June 1988.
2. In conjunction with SCE's management program for Units 2 and 3 hardware changes are defined and approved at least 12 months prior to an outage to permit incorporation in the outage master schedule and inclusion in the authorized outage budget. Because the proposed DSS has not yet been approved, scheduling, planning, procurement and budgeting have been changed so that the DSS will be installed during the Cycle 5 refueling outages.

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3. In addition, in this case, there are some procurement lead time considerations. Approval of the final DSS engineering design must be received at least 9 months prior to the installation refueling outage because of the 9 month required electrical component procurement lead time. The engineering and procurement are currently planned only for the DSS, and procurement is on hold until the concept is approved.

It is our understanding that the NRC is working to identify the specific ATWS rule compliance requirements for newer Combustion Engineering plants, including San Onofre Units 2 and 3, by evaluating these newer plants simultaneously. If the NRC approves the existing DSS design for San Onofre Units 2 and 3 by June 1, 1988, then the current Cycle 5 schedule can be maintained. Should any changes to the existing DSS design or additional hardware modifications be necessary for compliance with the ATWS rule, then a schedule reevaluation would be necessary including satisfying the lead times in items 2 and 3 listed above.

Please contact me if you have any questions concerning this matter.

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