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SUBJECT: Informs of mods implemented which enhance plant safety but not specifically required by regulations. Byron-Jackson reactor coolant pump (RCP) seals being replaced w/Bingham-Willamette RCP seals.

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June 13, 1986

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Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Director
PWR Project Directorate No. 7
Division of Licensing - B
U.S. Nuclear Regulator Commission
Washington, D.C. 20555

Gentlemen:

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

Since the start of the San Onofre project, Southern California Edison Company (SCE) has actively pursued methods to increase plant safety, availability and operability. The purpose of this letter is to inform the NRC of some modifications that have been implemented at San Onofre Units 2 and 3 that improve the overall plant performance and enhance regulatory compliance.

One of the major plant modifications currently underway is replacement of the existing Byron-Jackson (BJ) Reactor Coolant Pump (RCP) seals with Bingham-Willamette (BW) RCP seals. While the BJ seals have not been a safety concern, they have exhibited undesirable operational characteristics and required frequent replacement. The new BW seals will provide greater operational flexibility, increase plant availability and require less frequent replacement due to their more durable design.

Steam generator life expectancy has been increased due to the addition of the full flow condensate polishing demineralizer (FFCPD). The FFCPD removes corrosives from the secondary plant chemistry that would otherwise erode steam generator tubes. Additionally, because the FFCPD will reduce steam generator tube erosion/failure, plant safety and availability are increased.

Operation of the Unit 2 main steam isolation valves (MSIV) will be significantly improved due to the recent replacement of the MSIV actuator valves. The previous actuator valving (Marrota valves) consisted of a single valve and have been replaced with new actuator valving (Paul Monroe valves) which consist of a double valve. It is expected that this double valve design will result in a reduction of MSIV failure by a factor of 4. This design change will be implemented on Unit 3 during the next scheduled refueling outage.

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Component Cooling Water (CCW) system availability has been increased by installation of a backflush system to the CCW heat exchangers on the salt water side of the heat exchangers. This extensive modification allows flow in the heat exchangers to be reversed, thereby flushing accumulated ocean debris back into the ocean to increase the heat transfer capability of the CCW heat exchangers. Both maintenance time and the time needed to exit NRC-mandated Technical Specification action statements have been significantly reduced. Thus, plant availability is increased and thermal cycling of plant equipment is decreased.

SCE has been a participant in the Combustion Engineering Owners Group (CEOG) Core Protection Calculator (CPC) Improvement Program. This effort has been directed toward improving plant operability by reducing spurious reactor trips caused by the CPC's. By reducing reactor trips, challenges to the plant safety systems are also reduced thereby increasing overall plant safety. Additional data processing improvements will be afforded by the scheduled installation of a backup/redundant core performance monitoring computer. These computers are responsible for the utilization of the Core Operating Limit Supervisory System (COLSS) program. These changes and improvements increase plant safety and reliability, enhancing compliance with NRC requirements.

Several modifications have been made to the radiation monitoring system. For the existing radiation monitors, design changes have been implemented to improve operability and reliability. Also, SCE has installed redundant noble gas radiation monitors that will prevent plant shutdown in the event that maintenance on the radiation monitoring system requires more than the out of service time allowed by the Technical Specifications. This will reduce the possibility of unnecessary plant shutdowns thereby reducing thermal cycling of plant systems.

SCE continues to provide for improved personnel productivity. Modifications have been implemented to reduce the time required for workers to process into and out of containment during outages and to improve technician working conditions. Personnel productivity has been further increased by the installation of six new maintenance buildings inside the plant protected area including shop facilities.

To reduce the task load on the Unit 2 control room operators, secondary chemistry alarms have been relocated from the control room to the chemistry lab. This reduces the number of alarms to which the control room personnel must respond and reduces the number of control room annunciators.

These improvements described above are only a few of the more substantive of the extensive modifications that have been made to improve

Mr. George W. Knighton

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plant and personnel performance. While not specifically required by NRC regulations, these plant modifications will enhance overall plant safety.

If you have any questions, please contact me.

Very truly yours

M. D. Medford

cc: H. Rood, NRC Project Manager
F. R. Huey, USNRC Senior Resident Inspector