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SUBJECT: Provides clarification of info previously submitted re App R deviation.

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November 21, 1988

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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  
Appendix R Deviation Request and Open Items  
(TAC Nos. 54814 and 54815)

On May 31, 1987, Southern California Edison Company (SCE) transmitted the Appendix R Compliance Assessment report for San Onofre Nuclear Generating Station, Units 2 and 3 (SONGS 2 and 3) to the Nuclear Regulatory Commission (NRC). The Compliance Assessment Report documented the criteria, methodology and results of SCE's reassessment of SONGS 2 and 3 compliance with the requirements of 10CFR50, Appendix R, Sections III.G, III.J, III.L, and III.O in light of new NRC guidance provided in Generic Letter 86-10. Also included as enclosures to the May 31, 1987 letter were SCE's formal requests for deviation from the requirements of 10 CFR 50, Appendix R. This letter provides clarification of information previously submitted by SCE.

As part of the effort to revise the Updated Fire Hazards Analysis (UFHA) to reflect the Appendix R reassessment, the Fire Area Boundary Penetration Seal Evaluation Program and the Appendix R deviations approved in the NRC's Safety Evaluation dated June 29, 1988, SCE has identified minor revisions to the ratings of certain fire area boundaries described in SCE's deviation requests. SCE has performed fire protection engineering evaluations, consistent with Generic Letter 86-10 guidance, to reverify the barriers' ability to prevent the propagation of fire. Since the subject barriers were discussed in deviation requests and approval thereof is documented in the NRC's safety evaluation, SCE is submitting updated information on the ratings of the barriers (Enclosure 1). Also provided for your information are the corresponding "Generic Letter 86-10" boundary evaluations for the barriers credited for the protection of safe shutdown components. The revised barrier ratings do not adversely affect the conclusions of the deviation requests with respect to the ability to achieve and maintain safe shutdown.

SCE is maintaining interim Appendix R compensatory measures (i.e., roving, hourly fire watches) in-place for the affected barriers pending NRC approval of the enclosed "Generic Letter 86-10" boundary evaluations or issuance of SCE's

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proposed fire protection license condition (Proposed Change Number NPF-10/15-244). The affected barriers are listed in the table in Enclosure 1 along with the corresponding boundary evaluation number. Subsequent to NRC approval of the boundary evaluations or issuance of SCE's proposed license condition, which would allow changes to be made to the approved SONGS 2 and 3 fire protection program utilizing 10 CFR 50.59, the compensatory measures will no longer be necessary and can be removed.

Another item that arose from the UFHA update pertains to the SONGS 2 and 3 yard area. As part of the Revision 4 update of the UFHA, SCE assigned fire area/zone designations to the SONGS 2 and 3 yard area. In obtaining the necessary information (i.e. safety-related and safe shutdown equipment), SCE became aware that redundant safe shutdown cables and equipment are located in the SONGS 2 and 3 yard area. This was identified to the NRC pursuant to License Condition 2.G by letter dated November 2, 1988. Since separation of these cables in all cases is not provided in accordance with the requirements of Appendix R, Section III.G, SCE is providing a formal request for deviation for NRC review. Enclosure 2 contains this deviation request for the SONGS 2 and 3 yard area.

By letter dated June 29, 1988, the NRC transmitted Revision 1 to the Fire Hazards Evaluation for SONGS 2 and 3. SCE has identified two minor issues discussed in the June 29, 1988 Safety Evaluation which require clarification. The section entitled, "Seismically Induced Fires," on page 9, refers to SCE's proposed alternative method for providing a seismically qualified fire water source, as described in our February 22, 1988 submittal. A number of difficulties have been encountered in implementing the proposed connections to the salt water cooling system, such that this method is no longer considered appropriate. Therefore, SCE will continue to utilize the existing mobile pumper trucks and tankers and will provide an alternate tie down pad for one tanker for instances where activities in one Fuel Handling Building truck bay require the tanker to be relocated. The alternate tie down pad will be constructed to the same design criteria/requirements as the existing tie downs and, therefore, will not adversely affect the SONGS 2 and 3 Fire Protection Program.

In the section entitled, "Auxiliary Support Functions," on page 14, the Safety Evaluation indicates that the Auxiliary Feedwater (AFW) pump rooms, CCW pump rooms and the Emergency Chiller rooms do not require HVAC-related systems for post-fire safe shutdown. Though this statement is true, SCE has refined the Appendix R analysis to reduce safe shutdown operator actions associated with opening the doors to the AFW pump rooms. For a fire in areas other than the AFW pump rooms and the eight (8) alternative shutdown areas, the electrical circuits which serve the AFW pump room HVAC fans satisfy Appendix R separation requirements. Hence, no operator action is required to open the AFW pump rooms' doors for a fire in these areas. The analysis still credits operator actions to open the AFW pump rooms' doors to provide natural circulation cooling for fires in the alternative shutdown fire areas and the AFW pump rooms. Thus, SCE has provided post-fire HVAC capability for the AFW pump rooms through cable separation or opening of the pump rooms' doors.

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In cases where this submittal revises positions reflected in previous fire protection submittals, the enclosed information supercedes that previously submitted. SCE requests that the NRC reflect this revised information in the final safety evaluation for the SONGS 2 and 3 fire protection program.

If you have any questions regarding this matter, please call me.

Very truly yours,



Enclosures

cc: J. B. Martin, Regional Administrator, NRC Region V  
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