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SUBJECT: Documents commitment re compliance w/ATWS rule 10CFR50.62.

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M. O. MEDFORD
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April 14, 1989

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Compliance with ATWS Rule - 10 CFR 50.62
San Onofre Nuclear Generating Station
Units 2 and 3
(TAC Numbers 59139 and 59140)

- References:
1. December 29, 1988 letter from Kenneth P. Baskin (SCE) to Document Control Desk (NRC), Subject: ATWS Rule (10 CFR 50.62) Exemption Request, San Onofre Nuclear Generating Station, Units 2 and 3
 2. June 6, 1986 letter from M. O. Medford (SCE) to Document Control Desk (NRC), Subject: Docket Nos. 50-361 and 50-362, San Onofre Nuclear Generating Station, Units 2 and 3
 3. November 22, 1988 letter from M. O. Medford (SCE) to Document Control Desk (NRC), Subject: Same as Reference 2

By Reference 1 SCE indicated that a Diverse Scram System (DSS) with an inherent Diverse Turbine Trip (DTT) would be installed during the San Onofre Units 2 and 3 Cycle 6 refueling outages. However, based on a recent request by the NRC staff to expedite installation of the DSS, Southern California Edison (SCE) has evaluated the possibility of installing the DSS during the upcoming Cycle 5 refueling outages. Based on this evaluation, it has been concluded that the DSS can be installed during the Cycle 5 refueling outages. Accordingly, in a recent telephone conversation with Mr. George Knighton (NRC), I committed to installation of the DSS during the Cycle 5 refueling outages which are currently scheduled for September 1989 at Unit 2 and mid-1990 at Unit 3. This letter documents this commitment. I believe the NRC is in agreement with this revised schedule.

The DSS design has been previously described in References 2 and 3. With installation of the proposed DSS, SCE will be in full compliance with the DSS and DTT requirements in the ATWS rule. As described in Reference 1 above, the proposed DSS goes significantly beyond the minimum ATWS rule requirements for a DSS. With respect to the auxiliary (or emergency) feedwater initiation

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portion of the ATWS Rule, SCE is fully involved in the continuing discussions and evaluations between the Combustion Engineering Owners Group and the NRC staff to resolve this issue. The Owners Group is working to present a proposed resolution to the NRC during May 1989.

If you have any questions or need additional information, please let me know.

Very truly yours,

A handwritten signature in cursive script, appearing to read "M O Medford".

cc: J. B. Martin, Regional Administrator, NRC Region V
F. R. Huey, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3