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SUBJECT: Provides second edition of integrated implementation
 schedule for Units 2 & 3, per LC 2.C(26) & 2.C(27).

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May 14, 1990

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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
Second Edition of the Integrated Implementation Schedule (IIS)
San Onofre Nuclear Generating Station
Units 2 and 3

Reference: November 15, 1989 Letter from F. R. Nandy (SCE) to Document
Control Desk (NRC); Subject: First Edition of the Integrated
Implementation Schedule (IIS), San Onofre Nuclear Generating
Station Units 2 and 3

This letter provides, as Enclosures 1 through 3, the second edition of the Integrated Implementation Schedule (IIS) for San Onofre Nuclear Generating Station, Units 2 and 3. The IIS is required by License Conditions 2.C(26) for Unit 2 and 2.C(27) for Unit 3.

As described in the License Condition, projects of regulatory origin must be ranked to determine their relative potential safety contribution utilizing the Westinghouse Analytical Ranking Process (WARP) computer code. The modifications must then be separated into two lists designated Schedule A and Schedule B. Schedule A items have implementation dates required by NRC regulations, orders or license conditions. Schedule B items are other NRC identified items which have implementation dates committed to by Southern California Edison (SCE) which would result in either:

- (a) Plant modifications;
- (b) Procedure revisions;
- (c) Changes in facility staffing requirements;
- (d) Items perceived by SCE as prospective NRC requirements;
- (e) Major tasks resulting from mandates of agencies other than the NRC;
or
- (f) Evaluation for major initiated issues not required by regulation,
license conditions, or orders.

In addition, a Schedule C is included which lists SCE initiated plant betterment projects.

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SCE has completed the evaluation of all currently committed regulatory items for SONGS 2 and 3. Enclosure 1 lists, by outage, the SONGS 2 Schedule A, B, and C projects. Enclosure 2 contains a similar listing for Unit 3. As required by the license conditions, Enclosure 3 contains a listing of ongoing evaluations for major issues which have been initiated for SONGS 2 and 3.

A comparison to the first edition of the IIS (referenced above) reveals that the following changes have occurred:

<u>Action</u>	<u>Unit</u>	<u>Cycle</u>	<u>Schedule</u>	<u>Modification</u>
Schedule Change	3	*	A	ATWS Diverse Emergency Feedwater Actuation System (DEFAS) (10 CFR 50.62)
Added	2/3	6	B	Diesel generator and Class 1E battery room Hi/Lo temperature alarm modifications resulting from a recent NRC Safety System Functional Inspection (SSFI)
Added	2/3	6	B	Control room human factors modifications resulting from LER 89-014
Added	2/3	6	C	Containment purge system blind flange installation
Added	2	6	C	Secondary chemistry alarms
Added	2(3)	6(5)	C	Relocate pipe vents on normally pressurized safety systems (for easier completion of surveillance testing)
Added	2/3	6	C	Turbine building sump low flow alarms
Added	3	6	C	Radwaste control room HVAC
Added	3	6	C	Moisture separator reheater
Deleted	2/3	6	C	Steam generator high level trip bypass during startup
Added	3	6	C	Condensate flow distribution

* Unit 3 DEFAS will be installed immediately after the return to service of Unit 2 from the Cycle 6 refueling outage.

<u>Action</u>	<u>Unit</u>	<u>Cycle</u>	<u>Schedule</u>	<u>Modification</u>
Added	3	5	B	Reverse 8 inch mini-purge valve inside containment in response to NRC Information Notice 88-73
Added	3	5	C	Snubber Reduction (Ongoing Program)

In addition, two common unit modifications (spent fuel pool purification system cross tie and sewage plant upgrade) were moved, for accounting purposes, from Unit 2 to Unit 3.

Since all the modifications which were added to Schedule B will be completed in the next refueling outage for each unit (Cycle 6), there was no need to run the WARP program to rank the safety significance of each modification. The rankings are only used to determine the priority for scheduling work that could not be completed in the next refueling outage. The only exceptions to the above are:

- 1) The 8 inch mini-purge valve reversal which will be completed in the current Unit 3 Cycle 5 refueling outage. This valve reversal does not require detailed engineering evaluations or procurement lead time as the other modifications do.
- 2) Unit 3 DEFAS which will be installed no later than immediately after the return to service of Unit 2 from the Cycle 6 refueling outage which is earlier than stated in the above reference.

Approximately 25% of resources for the Unit 2, Cycle 6 refueling outage will be allocated to regulatory projects, and approximately 20% of resources for the Unit 3, Cycle 5 refueling outage will be allocated to regulatory projects.

The above resource allocation percentages include two major plant betterment projects (spent fuel pool reracking for Unit 2 and third point feedwater heater replacement for Unit 3). If these projects are excluded, resources allocated for regulatory projects would be approximately 65% and 55% for Units 2 and 3, respectively.

If you have any questions on the second edition of the San Onofre 2 and 3 IIS, or if you require additional information, please let me know.

Very truly yours,



Enclosure

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

ENCLOSURE 1

SONGS 2 IIS

Cycle 6

Schedule A*

Anticipated Transients Without SCRAM (ATWS) Diverse
Emergency Feedwater Actuation System (10 CFR 50.62)
Station Blackout Modification (10 CFR 50.63)
(Contingent on NRC issuance of SER)

Schedule B**

Charging Room Components Venting to Heating
Ventilation and Air Conditioning (HVAC) (NRC
Inspection Reports 50-361/86-25, 50-362/86-26)+
Atmospheric Dump Valves (ADV) Upgrades to Allow Easier
Valve Operation (Letter to NRC, September 12, 1988)
Component Cooling Water (CCW) Modifications From
Results of SSFI to Mitigate Voiding
Second Refueling Water Level Indicator (GL 88-17)
HVAC Vital Barrier Stops (IE Notice 86-83)
Diesel Generator and Class 1E Battery Room Hi/Lo Temperature
Alarm Modifications From Results of SSFI
Control Room Human Factors Modifications (LER 89-014)

Schedule C***

Snubber Reduction (Ongoing Program)
Centrifugal Charging Pump Addition
Spent Fuel Pool Reracking+
Turbine Building Sump Monitor Low Flow Alarms
Containment Purge System Blind Flange Installation
Secondary Chemistry Alarms
Auxiliary Feedwater and Safety Injection Pipe Vent Relocation

- * NRC Rule or Order
- ** Regulatory Commitment (other than Schedule A)
- *** Plant Betterment
- + This is a Non-Outage Related Modification

ENCLOSURE 2

SONGS 3 IIS

Cycle 5

Schedule A*

ATWS Diverse Reactor Trip (10 CFR 50.62)

Schedule B**

Chemical Volume Control System (CVCS) Panel Modifications
(NUREG-0700)
Control Room Labeling/Instrument Panel Modifications (NUREG-0700)
Modify Instrument Air and Nitrogen Systems to Comply with GL 88-14
Pressurizer Spray Line Modifications (NRC Bulletin 88-08)
Reverse 8 Inch Mini-Purge Valve Inside Containment (Information
Notice 88-73)

Schedule C***

Non-1E Uninterruptible Power Supply (UPS) Inverter
Alarm Deletion
Chemistry Panel Improvements
Feedwater 3rd Point Heater Replacement
Letdown Accumulator Modification to Reduce Flow and
Pressure Instabilities
Replace Feedwater Isolation Valve Marrotas with Paul Monroe
Solenoids to Increase Reliability
Ladders and Platforms for Personnel Safety (Ongoing Program)
Spent Fuel Pool Reracking+
Auxiliary Feedwater and Safety Injection Pipe Vent Relocation
Snubber Reduction (Ongoing program)

- * NRC Rule or Order
- ** Regulatory Commitment (other than Schedule A)
- *** Plant Betterment
- + This is a Non-Outage Related Modification

SONGS 3 IIS (Cont'd)

Cycle 6

Schedule A*

ATWS Diverse Emergency Feedwater Actuation System (10 CFR 50.62)#
Station Blackout (10 CFR 50.63) (Contingent on NRC
issuance of SER)

Schedule B**

Charging Room Components Venting to HVAC (NRC
Inspection Reports 50-361/86-25, 50-362/86-26)+
ADV Upgrades to Allow Easier Valve Operation (Letter to
NRC, September 12, 1988)
CCW Modifications From Results of SSFI to Mitigate Voiding
Second Refueling Water Level Indicator (GL 88-17)
HVAC Vital Barrier Stops (IE Notice 86-83)
Diesel Generator and Class 1E Battery Room Hi/Lo Alarm Modifications
From Results of SSFI
Control Room Human Factors Modifications (LER 89-014)

Schedule C***

Snubber Reduction (Ongoing Program)
Centrifugal Charging Pump Addition
Turbine Building Sump Monitor Low Flow Alarms
Spent Fuel Pool Purification Cross Tie+
Sewage Plant Upgrade+
Containment Purge System Blind Flange Installation
Radwaste Control Room HVAC
Moisture Separator Reheater Modification
Condensate Flow Distribution Modification
Safety Injection Pipe Vent Relocation

* NRC Rule or Order

** Regulatory Commitment (other than Schedule A)

*** Plant Betterment

+ This is a Non-Outage Related Modification

To be installed at Unit 3 immediately after the return to service of
Unit 2 from the Cycle 6 refueling outage

ENCLOSURE 3

Ongoing Evaluations for Major Issues (SONGS 2 and 3)

- | | |
|----------|--|
| GL 88-20 | Individual Plant Examination (IPE) for Severe Accident Vulnerabilities |
| GL 89-10 | Safety-Related Motor-Operated Valve Testing and Surveillance |
| GL 89-13 | Service Water System Problems Affecting Safety-Related Equipment |

Annunciator Evaluations Based on Results of Detailed Control Room Design Review (NUREG-0700)