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 50-362 San Onofre Nuclear Station, Unit 3, Southern California 05000362
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SUBJECT: Forwards evaluation of Unit 2 license conditions relative to potential applicability Unit 3 license conditions, in response to NRC request.

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October 4, 1982

Director, Office of Nuclear Reactor Regulation
Attention: Ms. Janis D. Kerrigan, Acting Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

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

In response to a recent informal request by the NRC, SCE has reviewed the technical License Conditions for San Onofre Unit 2 Operating License No. NPF-10 relative to applicability to San Onofre Unit 3. Enclosed for your use and information is an "Evaluation of San Onofre Unit 2 License Conditions Relative to Potential San Onofre Unit 3 License Conditions."

We hope that the enclosed information will be useful to the NRC in preparing the Operating License for San Onofre Unit 3. If you have any questions or comments, please contact me.

Very truly yours,

M. D. Medford for KPB

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EVALUATION OF SAN ONOFRE UNIT 2 LICENSE CONDITIONS RELATIVE TO POTENTIAL
SAN ONOFRE UNIT 3 LICENSE CONDITIONS

SAN ONOFRE UNIT 2 LICENSE CONDITIONS

<u>LICENSE CONDITION NO.</u>	<u>DESCRIPTION</u>	<u>COMMENTS AND/OR PROPOSED COMPLETION DATES FOR UNIT 3</u>
(4)	Containment Tendon Surveillance	Consistent with the Unit 2 License Condition SCE will provide a surveillance program within three (3) years of the date of issuance of the Unit 3 Operating License.
(5)	Environmental Qualification	
(5)a	Qualification of Safety Related Electrical Equipment	The NRC has temporarily suspended this requirement. SCE currently plans to complete all work prior to startup following first refueling outage.
(5)b	Complete and Auditable Records	The NRC has temporarily suspended this requirement. SCE currently plans to complete all work prior to startup following first refueling outage.
(5)c	Implementation of Maintenance Program Procedures	Maintenance procedures will be fully implemented for Unit 3 prior to startup following the first refueling outage. In the interim, SCE will comply with the program delineated in SCE's letter of August 23, 1982.
(5)d	Implementation of Surveillance Program Procedures	SCE currently plans to implement surveillance program procedures prior to startup following the first refueling outage.
(6)	High Burnup Fission Gas Release	This condition will be satisfied as part of the response to the Unit 2 License Condition.
(7)	Low Temperature Overpressurization Protection	This condition will be satisfied as part of the response to the Unit 2 License Condition.
(8)	Control Room Pressurization Capability	Consistent with the Unit 2 License Condition, SCE is currently working on a schedule for completion of this work on both Units 2 and 3 by November 1, 1982.
(9)	Seismic Trip System	Complete for both units.
(10)	Volume Control Tank Control Logic	The volume control tank logic will be modified at the first refueling outage for Unit 3.
(11)	Proposal for Compliance with Regulatory Guide 1.97	Complete for both units. See SCE to NRC letter dated May 13, 1982.
(12)	Control System Failures	Consistent with the Unit 2 license condition, the evaluation for both Units 2 and 3 will be provided by April 1, 1983.
(13)	Diesel Generator Modifications	The heavy duty drive gears for Unit 3 will be installed prior to startup following the first refueling outage.
(14)	Fire Protection	
(14)a	Maintain and Implement Fire Protection Plan	Unit 3 will comply with this condition consistent with the Unit 2 Operating License Condition.
(14)b	Fixed Emergency Lighting	Complete for both units.
(14)c	Identify Deviations from SRP 9.5.1	Complete for both units. See SCE to NRC letter dated July 22, 1982.
(14)d	Fire Seals	Prior to fuel loading, SCE will complete inspection of all Unit 3 fire seals and will repair deficient seals or implement compensatory measures as defined in the Technical Specification.
(15)	Turbine Disc Inspection	Inspection for Unit 3 will be performed prior to startup following the second refueling outage.
(16)	Radioactive Waste System	The words "from the facility" in the Unit 2 condition should be revised to "from Unit 3."
(17)	Purge System Monitors	SCE currently plans to implement this requirement for Unit 3 prior to startup following the first refueling outage.

<u>LICENSE CONDITION NO.</u>	<u>DESCRIPTION</u>	<u>COMMENTS AND/OR PROPOSED COMPLETION DATES FOR UNIT 3</u>
(18)	Initial Test Program	Same wording used in the Unit 2 License is appropriate.
(19)	NUREG-0737 Conditions	
(19)a	Shift Technical Advisor	Complete for both units.
(19)b	Shift Manning	Adequate Shift Manning will be available prior to Fuel Load.
(19)c	Independent Safety Engineering Group	Complete.
(19)d	Procedures for Transients and Accidents	SCE provided Draft Emergency Procedure and Guidelines by letter dated April 29, 1982. Development of improved procedures for Unit 3 implementation prior to startup following the first refueling is contingent on completion of the ongoing NRC review of CE procedure guidelines.
(19)e	Procedures for Verifying Correct Performance of Operating Activities	This was completed for Unit 2.
(19)f	Control Room Design Review	Complete for both units. See SCE to NRC letter dated August 19, 1982.
(19)g	Special Low Power Testing and Training	SCE provided procedures by letter dated April 15, 1982. NRC observed low power tests on September 6, 1982. Consistent with the requirements of NUREG-0737 and recommendations of Branch Technical Position RSB5-1, Special Low Power Tests are not required for Unit 3.
(19)h	Reactor Coolant System Vents	Complete for both units. SCE's letter of April 27, 1982 provided procedures for system operation. Awaiting NRC approval.
(19)i	Post-Accident Sampling System	SCE proposes to have the system for Unit 3 operational prior to operation above 5% power. Reference SCE to NRC letter dated September 27, 1982.
(19)j	Safety Valve Test Requirements	Complete. SCE's letters of April 1, 1982 and June 29, 1982 to the NRC provided preliminary and final review results, respectively, which documented safety valve operability and the adequacy of associated piping and supports.
(19)k	Direct Indication of Safety Valve Valve Position	Complete. See SCE to NRC letter dated April 22, 1982.
(19)l	AFW Pump 48-Hour Endurance Test	The endurance test for Unit 3 AFW Pumps will be completed prior to operation above 5% power.
(19)m	Emergency Power Supply for Pressurizer Heaters	Complete for Unit 3.
(19)n	Additional Accident Monitoring Instrumentation	Complete for both units.
(19).o	ICC Instrumentation	
(19).o.1	Upgrade SMM	Prior to fuel load for Unit 3.
(19).o.2	Environmentally/Seismically Qualify Connectors	Prior to fuel load for Unit 3.

LICENSE CONDITION NO.	DESCRIPTION	COMMENTS AND/OR PROPOSED COMPLETION DATES FOR UNIT 3
(19).o.3 (19).o.4 (19).o.5	Environmentally Qualify CET Cables Provide SPDS Install HIRC Probes and Process Instrumentation	Prior to fuel load for Unit 3. Prior to startup following the first refueling outage. Prior to fuel load for Unit 3.
(19)p	Voiding in RCS	Complete. Report provided by SCE to NRC letter dated April 28, 1982.
(19)q	Revised Model for Small-Break LOCA's	Complete. Report provided by SCE to NRC letter dated April 28, 1982.
(19)r	Plant Specific Calculations Using Revised Model for Small-Break LOCAS	Awaiting NRC approval of revised model for Small-Break LOCA's. SCE will provide supplemental plant specific analysis within one year after NRC approval.
(19).s (19).s.1 (19).s.2 (19).s.3	Improved Licensee Emergency Preparedness Description of TSC Upgraded Emergency Support Facilities Maintain Interim Support Facilities Until Upgraded Facilities are Complete	Resolution of this License Condition for San Onofre Unit 2 will satisfy the requirement for Unit 3. Item (19).s.1 has been completed for both units.
(20)	Surveillance Program	In that most of the procedures in question are applicable to both units, this condition is unnecessary for Unit 3.
(21)	Laboratory Instrumentation	Complete for both units.
(22)	Design Verification Program	Complete for both units. See SCE to NRC letter dated April 5, 1982.
(23)	Emergency Preparedness Condition	Resolution of this License Condition for San Onofre Unit 2 will satisfy the requirements for Unit 3.
(24)	RCS Depressurization System (PORV's)	SCE is participating in the CE Owners Group effort to respond to NRC questions on both Units 2 and 3 by June 30, 1983.
(25)	Qualification of AFW Pump Motor Bearings	Consistent with the Unit 2 License Condition, a proposed hardware modification and schedule for modifications will be submitted by October 30, 1982.