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SUBJECT: Documents agreements reached during 840629 meeting.
 Agreements consistent w/requirements & will support
 resolution of license conditions re heated junction
 thermocouple & upgraded emergency instructions.

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M.O. MEDFORD
MANAGER, NUCLEAR LICENSING

July 10, 1984

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Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, 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

- References: A) Letter, M. O. Medford, SCE, to G. W. Knighton, NRC, Dated May 14, 1984, Requesting NRC Concurrence with SCE's Proposed Approach for Upgrading SONGS Units 2 and 3 Emergency Operating Instructions
- B) June 29, 1984 Meeting Between SCE and NRC to Discuss SCE's May 14, 1984 Submittal (Reference A)

SONGS Unit 2 License Condition 2.C(19)d requires that emergency procedures based on guidelines approved by the NRC be implemented prior to startup following the first refueling outage and License Condition 2.C(19)o.5 requires that the heated junction thermocouple's (HJTC's) and associated process instrumentation be installed. Similarly, SONGS Unit 3 License Condition 2.C(17)a requires that emergency procedures based on guidelines approved by the NRC be implemented prior to startup following the first refueling outage that occurs six months or more after NRC approval of the guidelines and License Condition 2.C(17)h requires that the HJTC be installed and operable prior to startup following the first refueling outage.

The Combustion Engineering Owners Group (CEOG) Emergency Procedure Guidelines Report, CEN-152, Rev. 1 has been approved by the NRC and is being utilized by SCE to upgrade the SONGS Units 2 and 3 Emergency Operating Instructions (EOI's). However, CEN-152, Rev. 1 does not include guidance for HJTC operation. SCE's May 14, 1984 letter (Reference A) advised the NRC of the inconsistency between NRC requirements imposed via the SONGS Units 2 and 3 License Conditions and the lack of approved NRC guidelines to support the inclusion of instructions for HJTC operation in the upgraded EOI's. Recognizing that CEN-152, Rev. 2 had been submitted to the NRC (not yet approved) and that Rev. 2 included guidance for HJTC operation, Reactor Coolant Pump (RCP) trip strategy and other additional operational considerations, SCE's May 14, 1984 letter also requested NRC concurrence with our intent to prepare upgraded EOI's by utilizing approved CEN 152, Rev. 1 and

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applicable HJTC guidance from Rev. 2 in order to facilitate compliance with the SONGS Units 2 and 3 License Conditions. SCE also proposed to incorporate applicable guidance for the RCP Trip 2/Leave 2 philosophy and requested NRC concurrence with SCE's approach by June 1, 1984 in order to facilitate timely preparation and validation of the upgraded EOI's and operator training for implementation prior to the SONGS Unit 2 return to power following the first refueling outage.

Because formal NRC concurrence/response had not yet been received by SCE to support the EOI Implementation Schedule provided as Enclosure I to this letter, SCE met with the NRC Staff on June 29, 1984 (Reference B) to discuss SCE's May 14, 1984 request. The purpose of this letter is to formally document the following agreements reached during the June 29, 1984 meeting:

1. The NRC agreed with SCE's decision to defer incorporation of the CEN-152, Rev. 2 information regarding RCP Trip 2/Leave 2 strategy in the ongoing EOI upgrade effort because of the current status of NRC review and SCE's scheduler consideration.
2. The NRC also agreed with SCE's approach for upgrading the SONGS 2 and 3 EOI's by using CEN-152, Rev. 1 and applicable HJTC guidance from CEN-152, Rev. 2. More specifically, the NRC recommended that the existing Inadequate Core Cooling (ICC) guidance contained in Rev. 1 be substituted with the ICC guidance contained in Rev. 2 which addresses HJTC operation and is in the final stages of NRC review. The NRC also indicated that their comments on the ICC guidance in Rev. 2 are minor and editorial in nature and that SCE should utilize the existing information in Rev. 2 to initiate preparation of the upgraded EOI's and that the NRC's comments would be available via the CEOG to SCE in the near future for inclusion in the SONGS Units 2 and 3 EOI upgrade effort. SCE agreed with the recommended NRC staff approach and stated that the NRC's forthcoming comments on the Rev. 2 ICC guidance would be incorporated if they were provided in a timely manner consistent with the Enclosure I schedule and based on the applicability of the comments to the SONGS 2 and 3 specific design and instrumentation.
3. Consistent with SCE's request the NRC also agreed to provide formal documentation of agreements reached at the meeting by July 23, 1984 (following receipt of this letter documenting SCE and NRC agreements).

SCE considers that the agreements reached in the June 29, 1984 meeting, as documented above, are consistent with our requirements and will support satisfactory resolution of the SONGS Units 2 and 3 License Conditions regarding HJTC's and upgraded EOI's. Regarding item 2 above, NRC comments on the ICC guidance in CEN 152, Rev. 2 are required by August 15, 1984 to ensure incorporation of applicable comments into the ongoing EOI upgrade effort for SONGS Units 2 and 3. The EOI's will be finalized based on the latest Rev. 2 ICC guidance available via the CEOG on August 15, 1984 in order to facilitate

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timely operator training and implementation. Also, as indicated in SCE's May 14, 1984 letter, SCE intends to incorporate other applicable CEN-152, Rev. 2 guidance into the SONGS 2 and 3 EOI's prior to startup following the next refueling outage which is scheduled to occur six months or more after NRC approval of the Rev. 2 guidelines. The six months lead time is necessary to allow sufficient time for EOI revision, validation and required operator training prior to implementation. As discussed above, your formal documentation of agreements reached during the meeting is requested by July 23, 1984.

If you have any questions or comments, please contact me.

Very truly yours,

FR [Signature]
for M. H. Clifford

Enclosure

cc: H. Rood, Project Manager, Licensing Branch 3
(Open by addressee only)
J. Clifford, PSRB (Open by addressee only)
Mr. A. E. Chaffee, U.S. NRC Senior Resident Inspector

EOI IMPLEMENTATION SCHEDULE

SAN ONOFRE NUCLEAR GENERATING STATION
UNITS 2 AND 3

	June	July	August	1984 September	October	November	December
Refueling Outage Unit 2							
Develop Upgraded EOI's							
Verification and Validation							
Training and Implementation							

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