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SUBJECT: Discusses 840920 NRC site visit & insp of heat junction thermocouple sys installation & implementation, Installation in both units acceptable.

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September 26, 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

SCE's letter of September 13, 1984 provided information regarding the San Onofre Units 2 and 3 Heated Junction Thermocouple (HJTC) System in response to an informal NRC request to facilitate a NRC site visit and inspection of the HJTC System installation and implementation at San Onofre Unit 3. The NRC site visit was completed on September 20, 1984 during which SCE gave a presentation of the following items related to the HJTC:

- o Implementation schedule
- o Design details
- o Installation/Startup process
- o Operating experience
- o Emergency Operating Instruction development
- o Operator training
- o System demonstration

The handouts used by SCE during the meeting are included as Enclosure I to this letter. It should be reiterated that SCE's HJTC Licensing commitments/requirements are the following:

Unit 2: Installed during the first refueling; operational following the first refueling.

Unit 3: Installed prior to fuel load (complete); operational following first refueling.

Accordingly, during the site visit the NRC was able to inspect/observe the San Onofre Unit 3 installation and sufficient detail was presented to allow the staff to favorably conclude that the plant-specific installation is acceptable for Unit 3 and should also be acceptable for Unit 2 given that the Unit 2 design and implementation will be the same as for Unit 3.

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Also discussed during the meeting was the NRC request for a proposed technical specification addressing the HJTC. NRC Generic Letter 83-37, dated November 1, 1983 included guidance on a technical specification to include all Inadequate Core Cooling Instrumentation (i.e., addition of the HJTC's for San Onofre Units 2 and 3). SCE's December 9, 1983 letter responded to Generic Letter 83-27 and indicated that the San Onofre Unit 3 HJTC system performance was being evaluated and that SCE would propose a technical specification when Unit 2 Cycle 2 technical specification changes are submitted. SCE and CE have since evaluated the proposed NRC technical specification along with the limited (less than one year) operating data from the San Onofre Unit 3 HJTC installation and conclude that the NRC proposed technical specification has the potential for severely impacting plant operability/availability because the ACTION statements are overly restrictive and have the potential to be punitive. The ACTION statements currently suggested by the NRC would require plant shutdown within seven days when one of the two HJTC probes is out of service. Repair and/or replacement of the probe could involve shutdown of the reactor and a corresponding six week outage (assuming a spare HJTC probe was immediately available. SCE currently has a spare probe on order and the best estimated delivery date is approximately April, 1985.) Additionally, the limited operating data collected thus far does not offer conclusive evidence regarding probe longevity. As discussed with the NRC during the September 20, 1984 site visit, the CE Owners Group (CEOG) Technical Specification Subcommittee met on September 5, 1984 to discuss the proposed NRC HJTC technical specification. The CEOG has initiated activity to satisfactorily resolve CEOG concerns regarding the restrictive nature of the ACTION statements. SCE is actively involved with the CEOG in pursuing satisfactory resolution and accordingly proposes to submit a Technical Specification change addressing the HJTC approximately 90 days following resolution of CEOG concerns with the NRC.

SCE considers that the San Onofre Units 2 and 3 specific HJTC installation and implementation are sufficient to satisfy NRC staff concerns in the interim until an HJTC technical specification change that is satisfactory to both the NRC and CEOG is developed. Specifically:

- o The San Onofre Unit 2 HJTC system will be installed and operational prior to following the first Unit 3 refueling outage.
- o The San Onofre Unit 3 HJTC system has been installed and is currently providing baseline data and will be operational following the first Unit 3 refueling outage.
- o SCE is in the final stages of preparing upgraded Emergency Operating Instructions (EOI's) which will address HJTC operation using applicable HJTC information from CEN-152, Rev. 2. This activity is consistent with NRC letter dated August 1, 1984 allowing SCE to use CEN-152, Rev. 1 along with applicable CEN-152, Rev. 2 HJTC guidance. These EOI's will be implemented for both Units 2 and 3 prior to startup following the Unit 2 refueling outage.
- o Control operators will be trained on these upgrade EOI's prior to startup following the first refueling outage for Unit 2.


September 26, 1984

- o Other instrumentation (Subcooled Margin Monitor, Core Exit Thermocouples, Pressurizer Level, etc.) is also available to assist the Control Operators in detecting the approach to inadequate core cooling.

In conclusion, SCE considers that the information presented to the staff during the September 20, 1984 site visit along with the San Onofre Units 2 and 3 HJTC implementation details are sufficient for the NRC to conclude that the installation is/will be acceptable and that the overly restrictive nature of the proposed technical specification needs to be satisfactorily resolved with the CEOG prior to implementation.

If you have any questions, please call me.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. R. H. for J. W. McDonald". The signature is written in a cursive, flowing style.

cc: Harry Rood, NRC Project Manager (to be opened by addressee only)  
A. E. Chaffee, USNRC Senior Resident Inspector, Units 1, 2 and 3