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 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Advises that rev to procedures generation package addressing safety significant deviations or additions from C-E Owners Group guidelines not necessary, in response to 840801 request for rev. Emergency Operating Instructions may be revised.

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December 27, 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
Procedures Generation Package
San Onofre Nuclear Generating Station (SONGS)
Units 2 and 3

The purpose of this letter is to respond to your letter of August 1, 1984 requesting additional information regarding the Procedures Generation Package (PGP) for SONGS, Units 2 and 3. Specifically, a revision to the PGP was requested that addresses any safety significant deviations or additions from the Combustion Engineering Owners Group (CEOG) guidelines in the following areas:

1. The addition of plant-specific details to the guideline steps;
2. The addition of plant-specific steps to encompass and address the systems and actions that are unique to SONGS, Units 2 and 3;
3. The deletion or modification of generic steps that cannot be performed at SONGS Units 2 and 3; and
4. The description of the process that has been, or will be, used to identify the information and control requirements of the operators and a description of the analysis or process used to ensure the availability and adequacy of the instrumentation and controls to meet the identified needs.

SCE and Combustion Engineering have reviewed the PGP for SONGS, Units 2 and 3 with respect to the items described above. SCE believes a revision to the PGP is not required at this time for the following reasons:

1. No safety significant deviations or additions were identified during the process of translating the CEOG guidelines into the upgraded Emergency Operating Instructions (EOI's); and

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2. The Detailed Control Room Design Review Report (DCRDR) and Program Plan submitted to the NRC on January 31, 1984 provided a description of the process that is used to identify the information and control requirements of the operators. A description of the analysis or process used to ensure the availability and adequacy of the instrumentation and control in the control room is also provided in the DCRDR report. Therefore, the information requested has already been supplied to the NRC. Additional information will be provided by SCE in a Supplement to the DCRDR report as discussed in a meeting with the NRC staff on August 30, 1984. This meeting was summarized in an NRC to SCE letter dated October 23, 1984.

The referenced letter of August 1, 1984 also described four items that were required to be incorporated into the EOI's prior to their implementation. The NRC staff concluded that use of Inadequate Core Cooling (ICC) instrumentation specified in CEN-152, Revision 2 at San Onofre, Units 2 and 3, is acceptable provided that the four items were incorporated in the EOI's based on CEN-152, Revision 1 using the ICC instrumentation specified in CEN-152, Revision 2. These items have been incorporated into the upgraded EOI's.

Further changes to the San Onofre Units 2 and 3 EOI's may be required upon completion of the NRC Staff's review of the generic technical guidelines of CEN-152, Revision 2. SCE will revise the San Onofre Units 2 and 3 EOI's to address any additional changes prior to startup following the next refueling outage that occurs six months or more after NRC approval of the CEN-152, Revision 2 guidelines.

If you have any questions, please contact me.

Very truly yours,

M. D. Medford

cc: Mr. H. Rood, NRC Project Manager
Mr. J. B. Martin, NRC Regional Administrator
Mr. F. R. Huey, NRC Senior Resident Inspector