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 THOMPSON, H.L. Division of Licensing

SUBJECT: Responds to 841227 Generic Ltr 84-24 re environ
 qualification of electric equipment required for compliance
 w/10CFR50.49. All equipment qualified except auxiliary
 feedwater pump motors.

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 TITLE: OR/Licensing Submittal: Equipment Qualification

NOTES: J Hanchett 1cy PDR Documents. ELD Chandler 1cy. 05000361
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February 28, 1985

Director, Office of Nuclear Reactor Regulation
Attention: Mr. Hugh L. Thompson, Jr., Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Environmental Qualification of Electric Equipment
San Onofre Nuclear Generating Station
Units 2 and 3

By Generic Letter 84-24 dated December 27, 1984, the NRC staff has requested licensees to submit a certified letter which indicates their compliance with 10 CFR 50.49. Particularly, that (a) the licensee has in place and is implementing an environmental qualification program that will satisfy the requirements of 10 CFR 50.49 within the currently approved schedule for the plant without further extension; (b) the plant has at least one path to safe shutdown using fully qualified equipment or has submitted a justification for continued safe operation (JCO) pending full qualification of any equipment not fully qualified; and (c) all other equipment within the scope of 50.49 is either fully qualified or a JCO has been submitted pending full qualification. The purpose of this letter is to provide SCE's certification of compliance for San Onofre Units 2 and 3.

In response to item (a), SCE has in effect an environmental qualification program which satisfies the requirements of 10 CFR 50.49. The program will be implemented within the 10 CFR 50.49 deadline of March 31, 1985. Replacement schedules for parts subject to age related degradation have been incorporated into the Preventive Maintenance Program. It is recognized that replacement schedules are subject to change as a result of future test data or practical experience. Such changes will be factored into the existing environmental qualification documentation. The Preventive Maintenance Program and maintenance procedures will be revised to comply with the environmental qualification documentation as necessary prior to the required maintenance or replacement of the qualified equipment.

In response to item (b), San Onofre Units 2 and 3 have a path to safe shutdown that has environmentally qualified equipment. Table 3.11-2 of the San Onofre Units 2 and 3 Final Safety Analysis Report (FSAR) lists and categorizes systems required to mitigate a Design Basis Accident or to attain a safe shutdown. Specific equipment and components for each system are discussed in the appropriate section of the FSAR as referenced in Table 3.11-2.

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February 28, 1985

Electrical equipment within the scope of 10 CFR 50.49 for San Onofre Units 2 and 3 is environmentally qualified except for the auxiliary feedwater (AFW) pump motors. SCE's letter of August 8, 1984 formally documents a July 23, 1984 discussion between SCE and the NRC regarding the design of the gravity-feed AFW pump motor lube oil cooling system. SCE's letter of April 2, 1984 provides a description of this system which will environmentally qualify the AFW pump motors. During the July 23, 1984 discussion, the NRC informally indicated that the gravity-feed AFW pump motor lube oil cooling system was acceptable. SCE's letter of August 8, 1984 informed the NRC that SCE was proceeding with system procurement activities for construction and installation during the first refueling outage of Units 2 and 3 respectively.

Consistent with Unit 2 License Condition 2.C(25), Unit 3 License Condition 2.C(20), and SCE's letter of August 8, 1984, the lube oil cooling system has been installed on Unit 2 and will be installed on Unit 3 prior to startup following the first refueling outage. Justification for continued operation was supplied in SCE's letter of July 12, 1982, as noted in License Condition 2.C (25) for Unit 2 and License Condition 2.C (20) for Unit 3.

In response to item (c), all equipment within the scope of 50.49 is fully qualified for San Onofre Units 2 and 3 with the exception of the Unit 3 AFW pump motors. The justification for continued operation supplied in SCE's letter of July 12, 1982 was approved in the Safety Evaluation Report dated November 15, 1982 which accompanied the Unit 3 full power license amendment.

With regard to IE Bulletins and Information Notices, these documents are reviewed and addressed as necessary. IE Bulletin responses are transmitted to the regional office as required. Information Notices are reviewed and documented in our records.

If you have any questions regarding this matter, please let me know.

Subscribed on this 28th day of February, 1985.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: M O Medford
M. O. Medford
Manager, Nuclear Licensing

Subscribed and sworn to before me this
28th day of February, 1985.

C. Sally Sebo
Notary Public in and for the County of
Los Angeles, State of California

My Commission Expires: Apr. 14, 1986

cc: H. Rood, NRC Project Manager
F. R. Huey, NRC Senior Resident Inspector

