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SUBJECT: Responds to unresolved item re updated FSAR noted in Insp
 Rept 50-361/85-09 on 850225-0305. Commitment to perform test
 of battery capacity complete, per Startup Procedure 2/3
 PE-448-01. Item closed.

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June 17, 1985

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 No. 50-361
San Onofre Nuclear Generating Station
Unit 2

Reference: Letter, Mr. James G. Partlow (NRC) to
Mr. Kenneth P. Baskin (SCE), "NRC Inspection of San Onofre
Units 1, 2 and 3," dated April 10, 1985

As a result of a recent inspection of the San Onofre site conducted February 25, 1985 through March 5, 1985 by Messrs. Callan, Sullivan, Conway and McNeil of the NRC, a number of unresolved and open items were identified. In particular, Unresolved Item 50-361/85-09-08 addressed an apparent inconsistency with respect to the SONGS Units 2 and 3 Updated Final Safety Analysis Report (FSAR) commitment regarding the first performance test of battery capacity and cited failure to perform such a test during the first two years of battery service on Unit 2 as an "apparent administrative oversight."

SCE's commitment to performing this test in the SONGS Units 2 and 3 FSAR Section 8.3.2.2.1.8.D is in accordance with the recommendations established by IEEE Std. 450-1975, "IEEE Recommended Practice for Maintenance, Testing and Replacement of Large Lead Storage Batteries for Generation Stations and Substations." In part this section reads:

"The first performance test of battery capacity is carried out within the first two years of service."

As the above issue was raised only one day before the inspection team exited, startup record retrieval and evaluation could not be completed in time for it to be resolved prior to the exit. Evaluation of startup records has determined, however, that this commitment was indeed satisfied in accordance with Startup Procedure 2/3 PE-448-01 within two years of the 1979 initial energization of the batteries.

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June 17, 1985

The NRC Region V expressed concern that the batteries were not placed in service until receipt of the Operating License or commencement of commercial operation or some other point in time subsequent to the completion of Startup Testing, and that the performance test should have been completed within two years following this undefined date. SCE believes the batteries were placed in service upon their initial energization in 1979 and completion of Startup Procedure 2/3 PE-448-01 in 1981 satisfied the commitment to perform the initial capacity test within the first two years of service. The batteries were in fact required to be placed in service in order to complete other startup tests which verified availability of DC control power to appropriate equipment. Service provided by the battery in order to perform startup testing between the time of their initial energization in 1979 and performance of the capacity test in 1981, far exceeds the battery service expected during two years of normal operation.

The objectives of Startup Test Procedures, in general, were established to ensure all FSAR statements regarding such testing were indeed satisfied prior to and/or immediately following receipt of the Operating License. Objectives 1.5 and 1.8 of Startup Procedure 2/3 PE-448-01 were included to verify the name plate rated capacity of the battery and its ability to satisfy the DC design load requirements under emergency conditions. Testing in accordance with this procedure satisfies the Acceptance Test, Performance Test, and Service Test requirements in accordance with IEEE Std. 450-1975 as indicated in FSAR Section 8.3.2.

In order to satisfy their concern, Region V requested that NRR be provided with SCE's interpretation of this requirement and the method of satisfying the commitment. Therefore, by submittal of the information provided herein, this unresolved item regarding battery testing and maintenance is considered by SCE to be closed.

If you have any questions or require additional information regarding the above, please contact me.

Very truly yours,

M. O. Medford

cc: Mr. J. B. Martin, Region V Administrator
Mr. H. Rood, NRC (To be opened by addressees only)
Mr. F. R. Huey, USNRC Senior Resident Inspector, Units 1, 2 and 3