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ACCESSION NBR: 8201210211 DOC. DATE: 82/01/13 NOTARIZED: NO DOCKET #:
 FACIL: 50-361 San Onofre Nuclear Station, Unit 2, Southern California 05000361
 50-362 San Onofre Nuclear Station, Unit 3, Southern California 05000362
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SUBJECT: Discusses indicators for detection of inadequate core cooling ICCI station procedures & training that justify confidence in interim ICCI sys until sys meeting NUREG-0737 requirements can be installed during first refueling outage.

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January 13, 1982

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Director, Office of Nuclear Reactor Regulation
Attention: Mr. Frank Miraglia, 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

In response to questions asked by NRC management during the November 18, 1981 and December 3, 1981 meetings relative to the subject of instrumentation for Inadequate Core Cooling (ICC), SCE's letter of December 16, 1981 reiterated SCE's position that the interim ICC system coupled with station operating instruction (OIs) and training provides a high degree of confidence that ICC will be detected and mitigated and that the interim system is sufficient for station operation during the first fuel cycle until the final ICC system can be implemented. The final ICC system will meet the requirements of Item II.F.2 of NUREG-0737 and will be implemented during the first refueling outage for San Onofre Unit 2, or the first unscheduled outage of sufficient duration following delivery of all necessary material/equipment, rather than the January 1, 1982 NRC requirement.

As part of a response to a specific question asked by Mr. Mattson, the December 16, 1981 letter also indicated that in addition to the 56 Core Exit Thermocouples, other multiple and diverse indicators could be used to detect ICC. As an example, the letter indicated the following multiple and diverse indicators are also considered for the detection of ICC during a Loss of Primary Inventory Event:

- RCS Subcooled Margin
- Pressurizer Pressure
- Steam Generator ΔP
- Reactor Coolant Pump Motor Amps
- RCS Temperature (hot and cold leg)
- Core Exit Thermocouples
- High Pressure Safety Injection Flow

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*Good
S/P*

Mr. Frank Miraglia

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During a recent telephone discussion, the NRC (Mr. F. Miraglia) indicated that the availability of the Reactor Coolant Pump Motor Amps as an indicator for the detection of ICC was questionable since the Reactor Coolant Pumps would be tripped during Loss of Primary Inventory Events. It should be noted that the parameters listed above are indicators that could be considered in the determination of ICC during all loss of primary inventory events. The procedure requires trending those indicators that could be available for the particular event in progress; while it is correct that the RCPs will be tripped when RCS pressure falls below the SIAS initiation setpoint, there are events where the pressure decrease may be relatively slow (thus providing information which could be used in detecting the onset of ICC until the RCPs are tripped) or events where re-start of the RCPs is allowed. Therefore, the Reactor Coolant Pump Motor Amps indication provides meaningful information in the detection of ICC or determination of the onset of ICC if the RCPs have not been tripped.

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

Very truly yours,

W P Bushen