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 DENTON, H. R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards GA Co 820210 ltr, discussion seven remaining potential finding repts per 820209 telcon. Findings will be resolved to demonstrate adequacy of present design.

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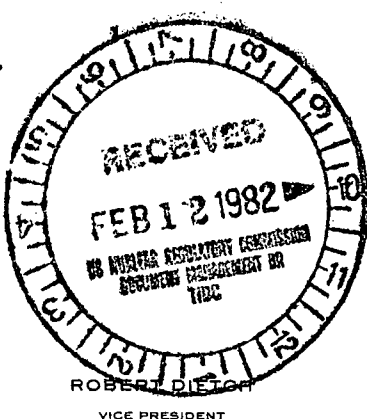
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Southern California Edison Company



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February 11, 1982

TELEPHONE
213-572-4144

Mr. Harold R. Denton
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

50-364/362

Dear Mr. Denton:

In accordance with your discussion with Mr. D. J. Fogarty on February 9, 1982, attached is a letter from G. L. Wessman, Director, Torrey Pines Technology, a division of General Atomic Company, to D. J. Fogarty dated February 10, 1982. This letter provides an update of the General Atomic Interim Report which was transmitted to you on January 25, 1982. This letter was received by SCE today and is being transmitted as it was received.

Included in the letter is a discussion on the seven (7) remaining Potential Finding Reports that had not been fully processed as of our February 9 meeting. We wish to point out that two (2) of these potential findings, PFR-0009 and PFR-0047, have since been classified by General Atomic as Findings. The former is design related and the latter is procedural. As was discussed with you and members of your staff, there is confidence that the problems identified by these Findings will be resolved in a manner such that the present design will be demonstrated to be adequate. However, if it is assumed that the adequacy cannot be demonstrated, physical modifications to correct the problems are relatively simple and would be implemented prior to operation above 5 percent power.

General Atomic discussed the Findings related to CE procedural matters (PFR's-0038, 0047, and 0052) with members of your staff by telephone on February 11, 1982. General Atomic indicated that the performance of the required quality activities involved in these Findings would be verified during completion of Task B. In the Design Review work completed to date under Task C, there is no indication that these functions were not properly performed.

Southern California Edison, based upon our ongoing audits of CE during the life of the project, as well as audits by others, believes that these Findings will be satisfactorily resolved and that there is not, nor has there been, any serious deficiency in the Combustion Engineering QA program or its implementation such that the adequacy of the San Onofre design has been adversely affected.

Very truly yours,

Robert Dietz

Enclosure

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GEORGE L. WESSMAN
Director

February 10, 1982

Mr. David J. Fogarty
Executive Vice President
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, California 91770

Dear Mr. Fogarty:

During discussion with the NRC staff on Tuesday, February 9, 1982, I was requested to summarize the current status of our independent verification of the seismic design of San Onofre Units 2 and 3, specifically addressing the status of the questions raised during the review reported in our Interim Report.

From the perspective of the overall program, the Program Plan has been issued and reviewed with NRC. The Interim Report summarizing the review completed by January 25, 1982, has been issued. The remainder of the review is proceeding basically on schedule toward a March 31, 1982 completion date.

The Program Plan was reviewed in Bethesda with Mr. Denton and his staff on December 3, 1981. This was followed by a meeting on January 6, 7, and 8, 1982 at our facilities in San Diego when the NRC staff reviewed in detail our implementation of this Program Plan. On January 13, 1982, Dr. Harold Agnew, President of General Atomic, and I met with Mr. Denton to review, in broad terms, the objectives and the approach used in our program. Following the issuance of the Interim Report I met with Mr. Denton and his staff in Bethesda on January 28, 1982 to review the work reported in the Interim Report and the interim conclusions reached. On February 9, 1982 I met with the NRC staff to review the status of the questions that had been raised during the review work reported in the Interim Report.

In the course of the review reported in the Interim Report, 58 documented questions, called Potential Findings, were raised. As of our meeting on February 9, 1982, 51 of these questions had been resolved. Twenty-six of these 51 were satisfactorily answered (these are classified as Invalid Findings). Nineteen of the 51 were classified as Observations, i.e., they are deviations based on our criteria, but because of their nature are judged not to have the potential for significant impact on the seismic design adequacy. Three Potential Finding Reports, (PFRs)-0034, 0038 and 0052, had been classified as Findings, i.e., they are actual

deviations that could have potential for significant impact on the seismic design adequacy. Three, PFRs-0042, 0046 and 0050, were determined to be out of the program's scope and therefore were not pursued.

The seven remaining questions had not been resolved as of the February 9, 1982 meeting. Although I cannot be certain of their significance until our investigation is complete, I believe three of these, PFR-0003, 0017 and 0027, will turn out to be design documentation problems. Since the February 9 meeting an additional question, PFR-0015, has been classified as an Observation. Another question, PFR-0009, relating to the design of cable raceway supports has been classified as a Finding. An additional question, PFR-0047, raised concerning the adequacy of design procedures has been classified as a Finding. The final question of the seven, PFR-0051, is on the technical adequacy of the design, but has not been processed to date. The impact of these last three on our interim conclusions will be addressed later.

In addition to the specific questions related to our reviews, trends in Observations and Findings, and in some cases even Invalid Findings, are being reviewed to detect any indication of generic flaws in the design process or the design methodology. Two such trends have currently been identified and Southern California Edison's (SCE) responses to these concerns are being reviewed.

The interim conclusions stated in the Interim Report can be updated based on the additional work completed on the resolution of the 58 questions raised in the review work completed for the Interim Report. The first interim conclusion stated "The design process used by SCE, CE, and BPC is adequate and could reasonably be expected to produce an adequate design." This statement has been somewhat weakened by the three Findings, PFRs-0038, 0047 and 0052, that address the adequacy of the procedures used in the design process. However, Combustion Engineering (CE) and SCE have stated that this function was in fact carried out, even though it was not as explicitly required by procedure as we feel would have been appropriate. Objective evidence of this has been requested and will be reviewed under Task B.

The second interim conclusion dealing with the technical review stated "In the work completed to date there have been no deviations found in the design which have been judged to have significant impact on the seismic design adequacy of San Onofre Units 2 and 3." This conclusion has been somewhat weakened by the Finding on the cable raceway supports, PFR-0009, and the unresolved technical question raised in conjunction with PFR-0051. Both of these basically concern the design methodology including the analytical approach, design control, and the data base, used by Bechtel Power Corporation (BPC). BPC's senior technical staff, including their Chief Civil/Structural Engineer, remain confident that the design is, in fact, adequate. Even if Bechtel's confidence is not borne out the modifications appear straightforward and should be able to be accomplished within a couple of months.

The third interim conclusion stated "The SCE and BPC procedures for planning and scheduling audits of the construction site and fabricator's shops were consistent with the regulatory requirements except that SCE procedures did not require planned and periodic audits to determine the effectiveness of the QA program as required in 10CFR50, Appendix B, Section XVIII." (The exception was based on the Finding identified as PFR-0034.) This conclusion can now be strengthened since our concern has been ameliorated by examination of SCE audit reports and their Corrective Action Plan which indicate that, although not specifically stated as an audit objective, audits did assess adequacy of controls and not simply determine compliance or non-compliance with specific requirements.

The fourth interim conclusion stated "The pipe segment walkdown indicated that, except for the two open PFRs, the implementation of the design in the field is adequate." The exception taken in this statement can now be eliminated. The two questions raised have been classified as Observations. They dealt primarily with documentation of the as-built configuration.

In summary, while there have been changes in our attitude toward the adequacy of various segments of the overall design process since the issuance of the Interim Report, we do not see anything that should prevent the plant from receiving a low power license.

Sincerely,



George L. Wessman
Project Manager