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SUBJECT: Forwards "Natural Circulation Test Program Safety Evaluation" & procedures re natural circulation test, loss of offsite power & natural circulation demonstration program, per NUREG-0737, Item I.G.1.

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April 15, 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 No. 50-361
San Onofre Nuclear Generating Station
Unit 2

Consistent with the requirements of Item I.G.1, Special Low-Power Testing and Training, of NUREG-0737 which was most recently identified as condition (19)g to Operating License No. NPF-10 for San Onofre Unit 2 requiring SCE to submit to the NRC detailed test procedures and a safety analysis for the natural circulation test program by April 16, 1982, enclosed please find seven (7) copies of the following information (NRC Mail Code B028):

ENCLOSURE 1 - CEN-201(s), Natural Circulation Test Program, San Onofre Nuclear Generating Station, Unit 2 Safety Evaluation, April, 1982.

Enclosure 1 includes the safety analysis for the San Onofre Unit 2 Natural Circulation Test Program which was conducted in accordance with the requirements of 10 CFR 50.59 and demonstrates that the proposed tests do not involve an unreviewed safety question. In addition to the Safety Analysis, Enclosure 1 also contains a discussion of pretest assumptions, test abstracts, operational criteria, test termination criteria, and impact on the San Onofre Unit 2 technical specifications.

ENCLOSURE 2 - Natural Circulation Demonstration Program, Procedure SLP-333-02, Revision 0, San Onofre Nuclear Generating Station, Unit 2.

Enclosure 2 provides a detailed test procedure for the low-power portion (approximately 3% power) of the natural circulation test program and will be used to provide baseline experience to operating personnel. The objectives of the test procedures are to establish natural circulation flow conditions and to demonstrate (1) the capability to maintain natural circulation and adequate margin to saturation without the use of pressurizer heaters and (2) the capability to maintain natural circulation with one steam generator isolated and that full natural circulation flow can be reestablished when the isolated steam generator is returned to service.

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ENCLOSURE 3 - Loss of Offsite Power, Procedure SPA-381-01, Revision 0, San Onofre Nuclear Generating Station, Unit 2

Enclosure 3 provides a detailed test procedure for demonstrating the ability to shutdown and maintain the reactor in hot standby using only emergency power following a loss of offsite power and for demonstrating system operation under conditions that simulate a total loss of both offsite and onsite power. This test will be initiated from approximately 20% power.

ENCLOSURE 4 - Natural Circulation Test, Procedure 2PA-215-01, Revision 1, San Onofre Nuclear Generating Station, Unit 2

Enclosure 4 provides a detailed test procedure for demonstrating natural circulation following reactor trip from approximately 80% power and specifically to (1) determine that adequate boron mixing can be achieved under natural circulation conditions, (2) demonstrate the ability to perform a natural circulation cooldown to conditions for shutdown cooling initiation and (3) demonstrate that automatic control systems operate satisfactorily under steady-state and transient conditions.

Exemptions from specific Technical Specifications identified in Enclosure 1 will be necessary to facilitate satisfactory performance of the natural circulation tests. SCE will submit a formal request for the necessary specific exemptions in the form of a request for an Amendment to Operating License No. NPF-10 for San Onofre Unit 2 on approximately April 30, 1982.

It should be noted that the detailed test procedures provided as Enclosures 2, 3 and 4 represent the most current available drafts of the procedures. Even though these procedures are still undergoing detailed review, they are being provided to the NRC staff in order to facilitate expeditious review and approval of the Natural Circulation Test Program for San Onofre Unit 2.

SCE considers that the enclosed information satisfies the requirements of condition (19)g of Operating License No. NPF-10 for San Onofre Unit 2. Should the NRC require additional information, SCE is available to meet with the NRC at your convenience.

If you have any questions or comments, please let me know.

Very truly yours,

M. D. McLeod
for K. P. Baskin

Enclosures