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SUBJECT: Discusses mods to component cooling water sys boundary valves inside containment. Fully operational containment isolation actuation signal will be added to valves within 90 days.

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December 22, 1982

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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 Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

The purpose of this letter is to discuss forthcoming modifications to the Component Cooling Water (CCW) System boundary valves inside containment (HV-6223 and HV-6236). In recent meetings with Southern California Edison Company (SCE) the NRC has expressed a concern that these valves do not receive a Containment Isolation Actuation Signal (CIAS).

On an expedited basis, but at least within 90 days of the date of this letter, SCE will install and make fully operational a CIAS signal (with operator override capability) to the subject valves. The need for the 90 day period is based on material delivery schedules (e.g., electrical relays) and the time required to install and test the signals. The SONGS Units 2 and 3 Final Safety Analysis Report (FSAR), Chapter 6 currently states that the CCW System meets GDC 57. Following completion of the subject modifications, the non-critical loop of the CCW System (Penetrations 42 and 43) will meet GDC 56, and FSAR Amendment 32 (scheduled for issuance in March, 1983) will revise Chapter 6 to so state. Further, SCE will submit proposed technical specification changes to reflect these modifications on a schedule commensurate with the completion of these modifications.

Interim operation during the 90 day period is justified by the following. The current emergency procedures for SONGS Units 2 and 3 provide for immediate and subsequent operator actions to verify accomplishment of ECCS functions. The non-critical CCW loop isolation valves outside the containment (HV-6211 and HV-6216) receive automatic close signals. Failure of one of these valves to close is indicated to the operator in the control room by a light on a panel displaying the positions of all the containment isolation valves. Upon detection of such a failure to close, the operator by procedure will take action to manually close from the control room the corresponding inside containment motor operated containment isolation valve (HV-6223 or HV-6236) to insure containment isolation. It should be noted that the power to valves HV-6223 and HV-6236 is not currently locked out; this is in contrast to the response to question 010.29 which currently states that power is locked out to HV-6223 and HV-6236 to minimize inadvertent closure. This section of the FSAR will also be changed in FSAR Amendment 32.

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Mr. George W. Knighton

Page -2-

December 22, 1982

If you have any questions concerning the above information, please call me.

Very truly yours,

VP Baskin

cc: Harry Rood, NRC(to be opened by addressee only)

