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April 20, 1993

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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Diesel Fuel Oil Tank Surveillance
San Onofre Nuclear Generating Station
Units 2 and 3

The purpose of this letter is to document discussions with our NRC Project Manager regarding implementation of Surveillance Requirement 4.8.1.1.2(f)(2) for performing a pressure test on parts of the diesel fuel oil system for the emergency diesel generators. This 10 year surveillance will be performed during the upcoming Unit 2 Cycle 7 refueling outage which is scheduled to begin in May 1993.

Surveillance Requirement 4.8.1.1.2(f)(2) reads:

Performing a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code at a test pressure equal to 110 percent of the system design pressure.

The diesel fuel oil storage tanks were originally designed to meet ASME Code requirements at 15 psig (29.7 psia) and are lined with a jet fuel epoxy coating for corrosion protection. Both the diesel fuel oil storage tank and the diesel generator day tank operate at atmospheric pressure and are continuously vented directly to the atmosphere. Therefore, because atmospheric pressure at the top of the tanks is the pressure at which these tanks will perform their design function, SCE will implement Surveillance Requirement 4.8.1.1.2(f)(2) by performing the pressure test for these tanks at 110 percent of 14.7 psia.

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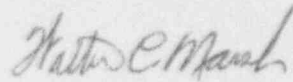
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If you have any questions regarding this information, please let me know.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Martin E. Marshall".

cc: J. B. Martin, Regional Administrator, NRC Region V
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2&3