Southern California Edison Company

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April 29, 1993

WALTER C. MARSH
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NUCLEAR REGULATORY AFFAIRS

TELEPHONE
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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**
Response to Generic Letter 88-20, "Individual Plant Examination for Severe Accident Vulnerabilities"
San Onofre Nuclear Generating Station
Units 2 and 3

References:

1. November 3, 1989, letter from R. M. Rosenblum (SCE) to Document Control Desk (NRC), Subject: Docket Nos. 50-206, 50-361, and 50-362, Generic Letter 88-20, "Individual Plant Examination (IPE) for Severe Accident Vulnerabilities," San Onofre Nuclear Generating Station, Units 1, 2, and 3

2. May 22, 1992, letter from R. M. Rosenblum (SCE) to Document Control Desk (NRC), Subject: Docket Nos. 50-361 and 50-362, Generic Letter 88-20, "Individual Plant Examination (IPE) for Severe Accident Vulnerabilities - 10 CFR 50.54(f)," San Onofre Nuclear Generating Station, Units 2 and 3

3. June 22, 1992, letter from Mel Fields (NRC) to R. M. Rosenblum (SCE) Subject: Review of Response to Generic Letter 88-20, Supplement 4 - Individual Plant Examinations for External Events - San Onofre Unit Nos. 1 and 2 (TAC Nos. M83671 and M83672)

This letter transmits Southern California Edison's (SCE's) response to Generic Letter (GL) 88-20, "Individual Plant Examination for Severe Accident Vulnerabilities," as committed to in References 1 and 2. The San Onofre Nuclear Generating Station (SONGS) Individual Plant Examination (IPE) program was conducted as described in Reference 1 and meets the objectives of GL 88-20 and NUREG-1335, "Individual Plant Examination: Submittal Guidance," Final Report, August 1989.

The enclosed IPE Submittal concludes that SONGS Units 2 and 3 contain no vulnerabilities to severe accidents initiated by internal events and that plant modifications to address vulnerabilities are not warranted. The core damage frequency due to internal initiating events at Units 2 and 3 was calculated to

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be approximately 3.0E-5 per year. The conditional containment failure probability was calculated to be approximately 0.16 per core damage event.

As part of the IPE process, SCE evaluated Unresolved Safety Issue (USI) A-45, "Shutdown Decay Heat Removal Requirements," and has concluded that no vulnerability topically associated with USI A-45 exists at SONGS Units 2 and 3. Therefore, this issue is considered resolved.

This submittal completes SCE's response to GL 88-20 for the IPE. The SONGS Units 2 and 3 Report for the Individual Plant Examination of External Events (IPEEE), as requested in GL 88-20, Supplement 4, is scheduled for submittal no later than June 1, 1995. This IPEEE submittal date is consistent with the submittal schedule requested by the NRC in Reference 3.

If you have any questions regarding this report, please call me.

Respectfully submitted,

Walter C. Marsh

By: Walter C. Marsh
Assistant Manager,
Nuclear Regulatory Affairs

Enclosure

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

State of California
County of Orange

On 4/29/93 before me, Mariane Sanchez, personally appeared Walter C. Marsh, personally known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

Witness my hand and official seal.

Signature Mariane Sanchez

OFFICIAL SEAL
MARIANE SANCHEZ
Notary Public-California
ORANGE COUNTY
My Commission Expires
October 14, 1994

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ENCLOSURE

SONGS 2 AND 3 INDIVIDUAL PLANT EXAMINATION
IN RESPONSE TO GENERIC LETTER 88-20