



*Southern California Edison Company*

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September 8, 1994

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
Fastener Strength Analysis  
San Onofre Nuclear Generating Station  
Units 2 and 3

Reference: Letter from W. C. Marsh (Edison) to NRC Document  
Control Desk, dated June 9, 1994.

In order to address certain employee concerns relating to fastener inspection requirements, Edison performed an analysis on this subject. In response to a request from Mr. Mel Fields of NRR, this analysis was transmitted to the Nuclear Regulatory Commission by the referenced letter.

Since the original issue of this paper, Edison has received questions, comments, and suggestions for clarification of the analysis and sampling plan from various sources and, has accordingly, updated the analysis. Enclosed are the revised White Paper and an independent evaluation of the efficacy of the sampling plan. The revised White Paper presents the nature and intent of the analysis more clearly; however, the revision does not change the substance of the analysis or the conclusions reached.

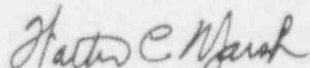
An independent consultant with recognized statistical expertise was retained to evaluate the sample plan used in our initial White Paper analysis. The consultant concluded that the sample method utilized in the White Paper was essentially equivalent to a purely random sample method. Statistical comparison of the White Paper data to that obtained during Receipt Inspection over the period of one year revealed the White Paper data to provide a conservative representation of fastener dimensions which could be assumed to exist in warehouse stock. Additional analysis has revealed that a 95/95% confidence/probability exists in the capability of safety-related warehouse fasteners to meet applicable strength requirements.

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If you have any questions on this matter please let us know.

Sincerely,



Enclosure

cc: L. J. Callan, Regional Administrator, NRC Region IV  
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Region IV  
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 CDM Files  
 NLFS Files (2)  
 ONL Files  
 NSG N46  
 RCTS

M. Ramsey E-mail

Concurrence 9-8-94

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Approved: K. A. Slagle

approved 4/8/94