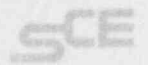


Southern California Edison Company



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September 20, 1983

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 No. 50-362
San Onofre Nuclear Generating Station
Unit 3

- References:
- A. Table 14.2-2A, Power Ascension Testing Sequence and Section 14.2.12.96, Loss of Offsite Power Test, of the San Onofre Units 2 and 3 FSAR.
 - B. NRC letter from Mr. George W. Knighton to Messrs. Robert Dietch (SCE) and James C. Holcombe (SDG&E) dated May 23, 1983
 - C. SCE letter from Mr. K. P. Baskin to Mr. George W. Knighton of the NRC dated June 29, 1983
 - D. NRC letter from Mr. George W. Knighton to Messrs. Robert Dietch (SCE) and James C. Holcombe (SDG&E) dated August 19, 1983

Reference A had originally specified that the Loss of Offsite Power Tests for San Onofre Units 2 and 3 would be initiated from 20% power during the post 80% power plateau.

Subsequently, in Reference B, the NRC approved deferral of the Natural Circulation Test Program for San Onofre Unit 2 beyond the 80% power plateau but prior to completion of the Startup Test Program. The Natural Circulation Test Program for San Onofre Unit 2 incorporated the Loss of Offsite Power Test in a sequence following the 80% trip to facilitate the conduct of the natural circulation test program. As a result the Loss of Offsite Power Test was also deferred.

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Since the Natural Circulation Test Program was not required to be performed on San Onofre Unit 3, SCE determined that conducting the Loss of Offsite Power Test at the post 80% power plateau for San Onofre Unit 3 as specified in the San Onofre Units 2 and 3 FSAR would require an unnecessary reduction in power level to 20% power. Accordingly, Reference C transmitted SCE's request to perform the Loss of Offsite Power Test for San Onofre Unit 3 during any 20% power level prior to completion of the San Onofre Unit 3 startup test program.

Reference D provided the NRC's response to the Reference C request. The NRC's response indicated that consistent with the Standard Review Plan, SCE should perform the Loss of Offsite Power Test for San Onofre Unit 3 as early as practical and before exceeding 25% power.

The purpose of this letter is to request your reconsideration of the Reference D response with respect to the schedule for the Loss of Offsite Power Test based upon the additional clarification provided below.

As you are aware NRC IE Information Notice No. 80-10 and an ensuing NSAC/INPO report, "Analysis and Evaluation of Crystal River - Unit 3 Incident," dated March, 1980 recommended more reliable non-IE instrumentation power as a result of the evaluation of the February 26, 1980 reactor trip at Crystal River Unit 3 involving loss of non-IE instrumentation power supply.

Accordingly, SCE initiated plans to install an Uninterruptable Power Supply (UPS) for San Onofre Units 2 and 3 to provide power to existing non-IE regulated 120V ac instrumentation power panels. Primary power to the UPS will be from a Class IE-source via an isolation device with diesel/generator backup and will include battery ride-through capability with an alternate ac power source from a non-IE bus. The UPS is designed to provide continuous power even during loss of offsite power or other loss of ac power events.

SCE is currently in the process of constructing the San Onofre Unit 3 UPS which is scheduled to be completed by approximately January 1, 1984. SCE considers that performance of the Loss of Offsite Power Test after completion of the UPS construction would allow SCE to verify the effectiveness of the UPS design philosophy. In order to allow time for completion of the UPS prior to test performance, SCE proposes to perform the San Onofre Unit 3 Loss of Offsite Power Test and review and approve the test results prior to entering the 100% power plateau.

Mr. G. W. Knighton

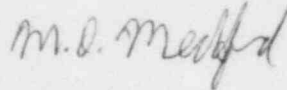
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Since the current startup testing schedule indicates that San Onofre Unit 3 is scheduled to proceed beyond the 20% power plateau during the first week of October, 1983, your timely approval of the proposed schedule change is requested.

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

Very truly yours,



M. O. Medford
Supervising Engineer
San Onofre Units 2 and 3 Licensing

cc: H. Rood (Open by addressee only)
W. Long (Open by addressee only)