

Southern California Edison Company

SAN ONOFRE NUCLEAR GENERATING STATION

P.O. BOX 128

SAN CLEMENTE, CALIFORNIA 92672

SCE

J. G. HAYNES
STATION MANAGER

March 7, 1984

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U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Attention: Mr. J. B. Martin, Regional Administrator

Dear Sir:

Subject: Docket Nos. 50-361 and 50-362
Prompt Report
License Condition 2.C.(14)a and 2.C.(12)a
San Onofre Nuclear Generating Station, Units 2 and 3

This submittal provides written confirmation of our notification pursuant to 10 CFR 50.36, 50.72, and license Condition 2.G to Facility Operating Licenses NPF-10 and NPF-15 for San Onofre Units 2 and 3, respectively, to the NRC on March 6 and 7, 1984, of reportable occurrences associated with the fire protection program.

License Conditions 2.C.(14)a and 2.C.(12)a of Operating License NPF-10 and NPF-15, respectively, require that SCE maintain in effect and fully implement the Fire Protection Plan as delineated in the Fire Hazards Analysis (FHA). During our continuing review (See LER 84-001, Docket No. 50-361) for the preparation of the updated Fire Hazards Analysis (FHA), and as a result of receiving and reviewing IE Information Notice (IN) 84-09, "Lessons Learned from NRC Inspections of Fire Protection Safe Shutdown Systems," we have on March 6, 1984, identified apparent discrepancies between the SCE Fire Protection Program and NRC requirements. SCE considers that many of the items here identified as apparent discrepancies represent deviation from the specified NRC criteria which is technically acceptable and is consistent with what SCE believed to be the NRC-accepted design basis for the plant. These discrepancies are being evaluated, and include:

- a. I&C cabling was analyzed and protected only for certain circuits used to assure remote safe cold shutdown capability, rather than analyzing and protecting all I&C safe shutdown cabling in all fire areas.
- b. Circuit separation in accordance with the Regulatory Guide 1.75 and IEEE-384 was relied upon as an acceptable method to preclude associated circuits problems rather than the performance of an associated circuits analysis as described in supplemental NRC guidance.

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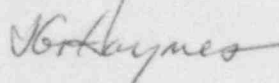
March 7, 1984

- c. SCE implemented separation criteria inside containment as described in the FHA, rather than as described in the criteria of Appendix R, Section III.G.2.
- d. As described in the FHA, SCE has provided an alternative safe shutdown capability without considering a concurrent loss of offsite power rather than apply guidance from Appendix R, Section III.L.
- e. As described in the FHA, SCE has provided alternative safe shutdown monitoring of pressurizer pressure and level, steam generator pressure and level, and reactor coolant (T_H) temperature, but did not include a source range flux monitor for reactivity control.
- f. Two fully-equipped station fire engines have been relied upon as having all required equipment, rather than ensuring that all fire hose houses are fully equipped in accordance with NFPA 24, as referenced in the FHA, Table III-1, paragraph E.2.g.
- g. SCE has used photoelectric smoke detectors which have been tested in accordance with a fire protection industry accepted manufacturer's test, rather than being Underwriter's Laboratory listed in accordance with NFPA 72 E, Article No. 2-5.1.1.
- h. SCE has identified the use of limited amounts of PVC insulated cabling in Units 2 and 3 which has been neither coated with fire retardant material nor tested in accordance IEEE-383.
- i. For smoke removal in certain areas, SCE relies upon portable smoke ejectors and ducting rather than using installed HVAC systems.
- j. Some fire protection equipment (standpipe shutoff valves, overcurrent protection devices and sprinkler deflectors) was not installed in compliance with NFPA requirements.
- k. SCE has identified the use of limited amounts of combustible flooring and fiberglass insulation.

Appropriate corrective action has been taken or is being evaluated and will be implemented as part of the dispositioning of all NCR's. A 14 day Followup report will be submitted by March 21, 1984. SCE believes that it is not the intent of License Condition 2.G to require the reporting of incidents such as these and will seek clarification from NRR.

If you have any questions regarding the above, please so advise.

Sincerely,



cc: A. E. Chaffee (USNRC Resident Inspector, Units 1, 2 and 3)
J. P. Stewart (USNRC Resident Inspector, Units 2 and 3)