

Southern California Edison Company

175 PARKER STREET
IRVINE, CALIFORNIA 92718

WALTER C. MARSH
ASSISTANT MANAGER
NUCLEAR REGULATORY AFFAIRS

October 30, 1992

TELEPHONE
(714) 444-4400

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Implementation of Guidelines from Generic Letter 89-04,
"Guidelines on Developing Acceptable Inservice Testing Programs"
San Onofre Nuclear Generating Station
Units 2 and 3

Reference: June 22, 1992, Letter from R. M. Rosenblum (SCE) to the Document Control Desk (NRC), Subject: Implementation of Guidelines from Generic Letter 89-04, "Guidelines on Developing Acceptable Inservice Testing Programs," San Onofre Nuclear Generating Station, Units 2 and 3

This letter is to inform the NRC of the status of Southern California Edison's (SCE's) review to identify recommendations from Generic Letter 89-04 which may not have been included in the San Onofre Units 2 and 3 Inservice Testing (IST) Program. In the referenced June 22, 1992, letter, SCE committed to complete the above review and update the IST program by November 1, 1992 and to complete any required plant modifications to support testing by May 1, 1994.

SCE has completed an extensive review of each of the approximately 4400 safety related valves on San Onofre Units 2 and 3, expending approximately 3 man years of effort in about six months. Of the approximately 3660 valves (total for both Units 2 and 3) not in the current IST program, about 275 safety related valves will be added to the IST program (Phase I). We are currently evaluating these valves and intend to incorporate them into the IST program in accordance with the schedule described in the following paragraphs. Additionally, from the review of approximately 740 valves already in the IST program about 180 valves were found to require additional testing (Phase II). We will develop a schedule for incorporation of these valves and will transmit this schedule to the NRC by December 31, 1992. If the addition of the Phase II testing impacts the schedule of the Phase I valves, that information will also be provided.

Currently each Phase I valve addition or program change is being evaluated by Station Technical and Operations to verify our ability to perform the testing.

9211050038 921030
PDR ADOCK 05000361
P PDR

ACH 1/0


For valves that can not be tested, a plant modification or a valve relief request will be developed. Because of the number of valves that need to be added to the program or require additional testing, approximately 455 in Phases I and II, SCE will not meet the commitment to update the IST program by November 1, 1992.

SCE has aggressively pursued incorporating the valves that can be tested quarterly. Approximately 80 valves will have test procedures written and be added to the IST program by November 1, 1992. The majority of these valves are already tested outside of the IST program. The other Phase I valves that can be tested during plant operation will be tested by April 1, 1993, as they are incorporated into the quarterly schedule.

The remaining Phase I valves will require either relief from the code, the plant to be in cold shutdown, and/or a plant modification. SCE will submit required relief requests by the end of March, 1993. Those valves that can be tested during cold shutdown will have test procedures written and be added to the IST program by the beginning of the Unit 2 Cycle 7 refueling outage, which is scheduled to begin in June of 1993. Plant modifications will be completed during the Cycle 8 refueling outages for each unit, currently expected to occur in the first and second quarters of 1995 for Units 2 and 3, respectively.

If you have any questions, please call me.

Very truly yours,



W. C. Marsh
Assistant Manager,
Nuclear Regulatory Affairs

C:\NETWP51\ist89-04.cmp

Enclosures

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

bcc: (See attached list)