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February 12, 1993

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

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**
Station Blackout Temperature Rise Analysis
San Onofre Nuclear Generating Station
Units 2 and 3

Reference A: George Kalman to Harold B. Ray, February 6, 1992, "San Onofre Nuclear Generating Station, Units 2 and 3 Station Blackout Analysis (TAC Nos. M68599/68600)."

Reference B: R. Ornelas (SCE) to Document Control Desk (NRC) letter dated March 12, 1992; Same Subject.

Reference C: R. M. Rosenblum (SCE) to Document Control Desk (NRC) letter dated June 11, 1992; Same Subject.

By letter dated April 17, 1989, SCE provided its initial response to the Station Blackout Rule to the NRC. This original submittal was supplemented by a second letter dated May 1, 1990. The NRC responded to these submittals by issuance of a Safety Evaluation Report (SER) dated February 6, 1992 (Reference A). This NRC SER requested additional information on several specific issues. By letter dated March 12, 1992 (Reference B), SCE responded to the February 6, 1992 SER and committed to provide additional information for resolution of comments on the loss of ventilation assumptions and inputs.

By letter dated June 11, 1992 (Reference C), SCE provided this additional information and, in response to NRC question 9, SCE committed to provide the NRC with a temperature rise reanalysis for the switchgear room, distribution room, computer room, control room, and control room cabinet area. The NRC had requested SCE to perform a reanalysis utilizing more conservative in-situ electrical heat loads. Accordingly, the purpose of this letter is to provide the requested reanalysis to the NRC (enclosed).

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Section 2.1, "Results" of the enclosed reanalysis currently indicates that the temperature of one Dominant Area of Concern (DAC) (the battery distribution rooms) is expected to rise above the maximum allowed temperature of 120°F during a postulated station blackout event. While SCE is continuing to evaluate other options, we are currently planning to implement administrative controls and/or procedures to ensure that the distribution room temperature remains below 120°F during an SBO event. This action will be coordinated with the SCE's previous commitment to ensure that the initial temperature in the switchgear room, distribution rooms, computer rooms, control room area, and control room cabinet area is maintained in accordance with UFSAR Table 9.4-4.

The enclosed reanalysis indicates that some DACs (computer room, control room, and control room cabinet area) will remain far below their SBO temperature limits for the duration of a postulated SBO event. To provide the largest possible operating "temperature window" for these DACs, SCE plans to revise the enclosed reanalysis to determine the highest initial temperature for these areas that will still ensure these areas will remain below their final SBO temperature limits. Once determined, these new, higher initial temperature limits will be incorporated into the next planned revision of the affected procedures and administrative controls, and the SBO supporting documentation file.

In our March 12, 1992 letter, SCE committed to complete all SBO related EOI modifications by June 30, 1993. This date was intended to coincide with operator training, requalifications schedules, and the upcoming Unit 2, Cycle 7 refueling outage. However, because the Unit 2, Cycle 7 refueling outage is currently scheduled for completion in August, 1993, we will need to extend the June 30, 1993 EOI revision date. SCE will implement the administrative controls and/or procedures by the end of the Unit 2, Cycle 7 refueling outage.

If you have any questions, or require additional information, please let me know.

Very truly yours,

Walter C. Marsh

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