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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Response to Information Requested in the NRC's Review of Responses
to Anomalies for San Onofre Nuclear Generating Station, Units 2
and 3, Inservice Testing Program (TAC Nos. M93558 and M3559)
San Onofre Nuclear Generating Station
Units 2 and 3

- References: 1) Letter from Mel B. Fields (NRC) to Mr. Harold B. Ray
(Edison) dated April 22, 1996; Subject: Review of Responses
to Anomalies for San Onofre Nuclear Generating Station,
Units 2 and 3, Inservice Testing Program (TAC Nos. M93558
and M3559)
- 2) Letter from Walter C. Marsh (Edison) to the Document Control
Desk (NRC) dated August 28, 1995; Subject: ASME Code Update
for the Second Ten Year Interval, Inservice Testing Program,
San Onofre Nuclear Generating Station, Units 2 and 3
- 3) Letter from Theodore R. Quay (NRC) to Harold B. Ray (Edison)
dated August 31, 1994; Subject: Second 10-Year Interval for
Inservice Testing of Pumps and Valves - San Onofre Nuclear
Generating Station, Unit No. 2 (TAC M87283) and Unit No. 3
(TAC No. M87284)

This letter is to inform the NRC of changes to the Inservice Testing (IST)
program. These changes resulted from Southern California Edison's (Edison's)
evaluation following the receipt of the April 22, 1996, letter (Reference 1).

By the August 28, 1995, letter (Reference 2) Edison responded to seven
anomalies which the NRC identified in the August 31, 1994, letter (Reference
3). The April 22, 1996, letter (Reference 1) provided the results of the
NRC's review of Edison's response. Reference 1 closed out the NRC review of
Edison's second ten-year IST program. However, reference 1 did contain two
comments that have now been addressed by Edison's IST program.

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Comment 1:

In the NRC review of Anomaly 3, which addressed several Alternate Testing Justifications (ATJs), the NRC stated:

"The anomaly indicated that there were several ATJs which did not adequately demonstrate the impracticality of testing the subject valves quarterly during power operation or during cold shutdowns if testing is deferred to refueling outages. Each listed ATJ was reviewed by the licensee and, using the guidance in NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," April 1995, the testing frequency was adjusted or additional justification was incorporated into the basis for deferral. (Note, however, that in the resolution description for ATJ 14.0, Part 3, S2(3)2423MU017, the licensee states that "the close exercise test has been removed from the Inservice Testing Program Requirements," while the basis states that "the basis document calls only for a close verification." The statements appear to contradict each other and that it is rather the open function that has been deleted from the IST program.)"

Response:

S2(3)2423MU017 is a normally closed check valve. The IST basis document and the Program document have been revised to show that the only test required is an Appendix J leak test.

Comment 2:

Under "Other Comments" the NRC stated the following concerning Position Indication Testing (PIT):

"In reviewing the changes to the IST program plan, an item was noted that may require action by the licensee. Revised Note 23 states that, contrary to the SONGS-2/3 IST basis document and because the subject valves are locked in position, "no actual PIT [position indication verification] test is required ..."The licensee should evaluate the consistency of Revised Note 23 with the ASME OM-10 provisions and inform us of any changes to the IST Program plan resulting from the evaluation."

Response:

Edison has removed Note 23 from its program and will perform PITs on the affected valves (four per unit) by the end of the Cycle 9 refueling outage for each unit. Additionally, the IST basis document was reviewed, and an additional 6 valves per unit (listed in the enclosed table) were identified that used this same logic for excluding PITs. Testing of these valves will also be completed by the end of the Cycle 9 refueling outage for each unit.

Please let me know if you have any questions.

Very truly yours,

T. D. Mercurio
for J. L. Rainsberry

Enclosure

cc: L. J. Callan, Regional Administrator, NRC Region IV
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3

Tests added to the Inservice Testing Program

Valve Name	Description	Test Added	Test Interval
S2(3)2423MU055	Service Air Containment Isolation Valve	Position Indication Test	Refueling
S2(3)1204MU099	Safety Injection Tank to Refueling Water Tank (RWT) Containment Isolation Valve	Position Indication Test	Refueling
S2(3)1204MU022	Isolation Valve, RWT-005 to LSPI P015 Suction	Position Indication Test	Refueling
S2(3)1204MU023	Isolation Valve, RWT-006 to LSPI P016 Suction	Position Indication Test	Refueling
S2(3)1201MU015	Isolation Valve, Shut Down Cooling to LPSI P015 Suction	Position Indication Test	Refueling
S2(3)1201MU018	Isolation Valve, Shut Down Cooling to LPSI P016 Suction	Position Indication Test	Refueling