

Southern California Edison Company

SCE

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VICE PRESIDENT

August 30, 1985

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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
IE Inspection Report Nos. 50-361/85-13 and 50-362/85-12
Response to Notices of Violation and Deviation
San Onofre Nuclear Generating Station, Units 2 and 3

Mr. D. F. Kirsch's letter of July 31, 1985, forwarded a Notice of Violation and Notice of Deviation resulting from the special inspection conducted during the period March 23 through May 21, 1985. The enclosure to this letter provides our response to the Appendix A & B Notices as requested therein.

As discussed in our response to the Notice of Deviation, SCE believes that the commitments specified in the FSAR were met. At the time of the inspection, time did not permit us to review the history files on the development of FSAR Section 6.2.2.1.2.3.c. However, as discussed in our enclosure, upon receiving the Notice of Deviation, we did review those files, and the requirement for locking open certain valve motor operator circuit breakers was clearly intended for post-LOCA shutdown cooling operation. Accordingly, SCE respectfully requests the deviation be withdrawn.

Mr. Kirsch's letter also requested our position on the issues involving application of Technical Specifications for Main Steam Isolation Valves. We have provided this information under separate cover.

If you require additional information, please so advise.

Sincerely,

Kenneth P. Baskin

Enclosure

cc: F. R. Huey (USNRC Senior Resident Inspector, Units 1, 2 and 3)

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Enclosure

Appendix A* to Mr. D. F. Kirsch's letter of July 31, 1985, states:

"C. Paragraph 6.8.1 of the Unit 2 and 3 Technical Specifications states, in part:

'Written procedures shall be established, implemented and maintained covering the activities referenced below:

- c. Surveillance and test activities of safety related equipment.'

"Paragraph 6.1.1 of Procedure SO23-3-3.16, 'Auxiliary Feedwater System Monthly Tests,' issued pursuant to Specification 6.8.1, requires a trip test of the steam driven auxiliary feedwater pump in order to ensure pump operability.

"Contrary to the above requirements:

1. A trip test of the Unit 3 steam driven auxiliary feedwater pump was not conducted during the months of November and December 1984 and January 1985. During this period Unit 3 was in Modes 1, 2 and 3.

"This is a Severity Level V Violation (Supplement I) applicable to Unit 3."

RESPONSE

SCE acknowledges the above procedural noncompliance occurred. The cause and corrective actions being taken are the same as those being taken in response to Item A of Appendix A to Mr. D. F. Kirsch's letter of July 31, 1985. SCE's response to that item is contained in Licensee Event Report (LER) 84-043, Docket No. 50-362. As discussed in LER 84-043, SCE recognizes the importance of administratively controlling the process for which procedures used for operability verification are modified.

The implementation of the monthly surveillance procedure, SO23-3-3.16, is accomplished utilizing a check-off list (COL). The Auxiliary Feedwater Pump Turbine Trip test portion of the surveillance procedure was initially placed in the COL, in a revision dated November 8, 1983, as a result of an event described in LER 83-099 (Docket No. 50-362). However, it was then inadvertently removed from the COL, when SO23-3-3.16 was completely revised on June 22, 1984.

* As indicated in Appendix A, no response is requested concerning Items A and B.

Enclosure
(Continued)

1. Corrective Steps Which Have Been Taken and the Results Achieved

The following corrective actions will ensure that check-off lists used for operability verification are complete.

- Surveillance procedure S023-3-3.16, "Auxiliary Feedwater System Monthly Tests" was revised on February 28, 1985, to reinclude the auxiliary feedwater pump turbine trip test into the COL.
- S023-3-3.16 was properly performed for Unit 3 on March 1, 1985.
- All Operations surveillance procedures for Units 1, 2, and 3 were reviewed to identify any other instances where appropriate requirements were not currently included in the associated check-off list. Only two other instances were identified and both were corrected.
- Operating Instruction S023-0-31, "Operating Instructions Author's Guide" was revised to include in the author's checklist a requirement that the performance and documentation of surveillances including the acceptance criteria be moved from the body of the procedure to the check-off lists. The Operating Instruction applicable to Unit 1, S01-14-24, "Operations Procedure Group" was revised to include this requirement.

2. Corrective Steps Which Will Be Taken to Avoid Further Violations

The corrective actions taken above are sufficient to avoid further violations.

3. Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 1, 1985.

Enclosure
(Continued)

Appendix B to Mr. D. F. Kirsch's letter of July 31, 1985, states:

"Paragraph 6.2.2.1.2.3.c of the FSAR states, in part:

'6.2.2.1.2.3.c Operating During Shutdown Cooling To preclude diverting shutdown cooling flow to the containment spray header, the header isolation valves (HV-9367 and HV-9368) are closed and power to their operators is locked out.'

"Contrary to the above commitment, the spray header isolation valves (HV-9367 and HV-9368) did not have power removed from their operators during shutdown cooling operation on February 27, 1985.

"This is a deviation applicable to Unit 2."

RESPONSE

INTRODUCTION

SCE has determined that the FSAR statement cited above is applicable to post-LOCA conditions only and is not applicable to shutdown cooling operation during normal plant conditions. This conclusion became evident after the NRC inspection, during a review of the chronology of documents supporting the FSAR statement. Additionally, SCE has verified that applicable emergency operating instructions, design documents, and administrative controls have been properly implemented and maintained in effect to preclude diversion of shutdown cooling during post-LOCA conditions as described in the FSAR statement.

BACKGROUND

As a result of NRC Branch Technical Position RSB 5-1, Licensees were required to ensure that operators would be able to manipulate all valves necessary to initiate shutdown cooling from the control room. One of the results of this requirement at San Onofre necessitated closing the containment spray header isolation valves HV-9367 and HV-9368 and to lock-out the power to their operators while in the post-LOCA shutdown cooling mode. In this post-LOCA cooling configuration, this precludes inadvertent valve operation which would create a larger LOCA scenario.

In November 1981, the Architect Engineer, Bechtel Power Corporation (BPC) implemented this requirement and completed Design Change Package (DCP) 11-N to provide power lock-out (PLO) to HV-9367 and HV-9368. At this time, the Interim Drawing Change Notice associated with DCP 11-N was annotated to reflect the PLO requirement was post-LOCA. Footnote #5 next to HV-9367 and HV-9368 in P&ID drawing 40114, "Containment Spray System" states "power lock-out during post-LOCA shutdown cooling."

Enclosure
(Continued)

Because the operation of the shutdown cooling system in the post-LOCA environment is controlled by emergency operating instructions (EOI), on December 7, 1981, EOI SO23-3-5.6, "Loss of Coolant Accident" was revised to require the breakers associated with HV-9367 and HV-9368 to be locked open when placing the shutdown cooling system in operation post-LOCA. This requirement has not been removed from procedures.

In accordance with SCE programs for the control of DCPs, appropriate changes to the FSAR and P&ID drawings were initiated. P&ID Figure 6.2-46 (Updated FSAR, Section 6) was included as Amendment 28 to the FSAR, which was submitted to the NRC on January 1982. This P&ID includes the footnote #5 which provides for power lock-out of HV-9367 and HV-9368 during post-LOCA shutdown cooling.

The FSAR itself was changed in July 1982 in Amendment 30, updating Section 6.2.2.1.2.3.c, "Operations During Shutdown Cooling." to add the following two (2) new paragraphs to account for DCP 11-W, as follows:

"To preclude diverting shutdown cooling flow to the containment spray header, the header isolation valves (HV-9367 and HV-9368) are closed and power to their operators is locked out.

"Should it be necessary to initiate containment spray system operation for iodine removal purposes after the shutdown cooling system is aligned for post-LOCA shutdown cooling, the SDCHX's can be remotely realigned to the containment spray pumps. Shutdown cooling operation may have to be temporarily suspended unless both SDCHX's are available."

Therefore, upon issuance of Amendment 30, the FSAR, both in the text of Section 6.2.2.1.2.3.c and in the P&ID drawing associated with the containment spray system (Figure 6.2-46), is consistent with the intention to have HV-9367 and HV-9368 PLO post-LOCA.

CONCLUSION

The information provided above documents the intent of the FSAR to preclude SDCHS diversion to the Containment Spray header during post-LOCA SDCHS operation. SCE has fully implemented this statement, since the applicable emergency procedure, drawings, and the FSAR were properly revised. Therefore, SCE respectfully requests that this Notice of Deviation be withdrawn.