

January 20, 2000

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

Subject: **NRC Performance Indicator Historical Data Submittal
San Onofre Nuclear Generating Station, Units 2 and 3**

- References: (A) NRC Regulatory Issue Summary (RIS) 99-006, "Voluntary Submission of Performance Indicator Data," dated December 1, 1999
- (B) Southern California Edison (SCE) letter from H. B. Ray to D. L. Meyer (USNRC), "Public Comment on the Pilot Program for the New Regulatory Oversight Program (64 Federal Register 60244 – November 4, 1999)," dated December 29, 1999.

Gentlemen:

Reference (A) requested that licensees provide historical data for the Performance Indicator (PI) program. The data are to be submitted on January 21, 2000. The guidance document for this submittal, NEI 99-02 Draft Rev. D, states that the January submittal should represent a "best effort" to collect and report historical data. The guidance also states that when data are not readily available, the data need only cover the previous four quarters (1Q/99 to 4Q/99). This letter discusses our limitations and concerns regarding the San Onofre data for the Protected Area Security Equipment Performance Index (Security Equipment PI) submittal.

The Security Equipment PI is calculated using the number of compensatory hours incurred in the previous 12 months when posting security equipment out of service. NEI 99-02, Draft Rev. D, contains a number of exemptions in determining whether to count a compensatory posting, including: environmental effects (heavy rain, fog, salt spray, etc.), animals (birds, squirrels, raccoons, etc.), equipment out of service for equipment upgrade, etc.

When the Security Equipment PI was developed, Southern California Edison (SCE) recognized that our program did not record compensatory posting information to the level of detail necessary to assure complete and accurate information. From the NRC public workshops, SCE recognized it was necessary to set up the infrastructure to begin recording new information as soon as practical. SCE revised applicable security programs and processes, and began recording the data for this metric beginning June 1999.

For the data prior to June of 1999, SCE does not have sufficient confidence that the available historical data for the Security Equipment PI meet even the intent of a "best effort" collection, nor do we consider it cost effective nor necessary to meet the intent of the new NRC program to attempt to recover this historical data. Accordingly, SCE will not be able to provide historical data for the Security Equipment PI in either the January 21, 2000 submittal nor in the first quarter submittal due in April 2000. We are, however, providing the data obtained since June 1999 for your information and use (Attachment). Fortunately, four quarters of data will be collected and available for SCE to provide "best effort" data for the second quarter submittal (July 2000).

Nevertheless, we have sufficient information to believe that the proposed algorithm for the Security Equipment PI is unnecessarily restrictive and should be revised. As noted in Reference (B), there is no regulatory restriction to a compensatory posting when a portion of the plant's Intrusion Detection System (IDS) equipment is out of service. SCE, therefore, believes that it is inappropriate to have an algorithm which creates the unintended consequence of artificially elevating the priority of non-safety related equipment maintenance of the IDS system above that, for example, of a channel of the Reactor Protection System. Imposition of such unreasonably stringent requirements here, without any commensurate improvement in overall plant safety, appear to be ill advised and may in fact prove counterproductive by artificially diverting future plant maintenance priority to the IDS.

If you have any questions regarding this information, please feel free to contact me.

Sincerely,



Attachment: San Onofre Protected Area Security Equipment Index (6/99-12/99)

cc: A. Madison, NRC: NRR
J. A. Sloan, NRC Senior Resident Inspector

ATTACHMENT

SAN ONOFRE PROTECTED AREA SECURITY EQUIPMENT INDEX*

June 1, 1999 through December 31, 1999

MONTH	NUMBER OF COMP HOURS	CUMULATIVE (from 6/1/99) QUARTERLY PI INDEX
June 1999	206.85 (includes 77.95 hrs CCTV)	0.100
July 1999	107.7	-
August 1999	63.0	-
September 1999	57.5	0.046
October 1999	114.5 (includes 15.7 hrs CCTV)	-
November 1999	44.6	-
December 1999	139.0 (includes 4.4 hrs CCTV)	0.043

*For clarity, the June PI was calculated based on 38 zones and 5 CCTVs; the September PI was calculated based on 37 zones and 5 CCTVs; and the December PI was calculated based on 36 zones and 5 CCTVs.