April 25, 2001

MEMORANDUM TO: Docket File

FROM: L. Raghavan, Senior Project Manager, Section 2 ***/RA/***
Project Directorate IV-2 and Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 -- FACSIMILE TRANSMISSION, ISSUES TO BE DISCUSSED IN AN UPCOMING PHONE CONVERSATION ON POWER UPGRADE (TAC NOS: MB1623 and MB1624)

The attached questions were transmitted by fax on April 24, 2001, to Mr. Derrick Mercurial of Southern California Corporation to prepare him and others for the telephone discussion on April 24, 2001. This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position.

Attachment: As stated

Docket Numbers: 50-361
50-362

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NAME	LRaghavan		MMcAllister	
DATE	04/27/01		04/27/01	

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ITEMS FOR DISCUSSION REGARDING SONG's POWER UPGRADE

QUESTIONS / REQUESTS

SECTION 2

Is the new instrumentation permanently installed and required to be continuously in operation?

My picture is that the only function of the new instrumentation is to periodically calibrate the existing venturi and temperature data. Is this correct?

Please expand on the determination of time for using the last good correction factor and the "good" vs. "bad" quality flags. How would basing calibration time on instrument drift characteristics address a transducer or transmitter change from its historic pattern?

Please provide a complete quantitative list of each contributor to power uncertainty for today's plant and for the requested power uprate.

Please provide a statement to the effect that you have evaluated the entire licensing basis and the regulatory requirements and either (1) the present analyses continue to bound the proposed operation or (2) you have reanalyzed, changed the plant, or changed operation to ensure that the licensing basis and the regulations will continue to be met.

SECTION 3.1 Have you confirmed that all differential temperature requirements continue to be met with the power uprate? (See also 3.3.3, 3.3.4)

3.3.1.4 How can you conclude that operating conditions during shutdown cooling are not affected vs. not significantly affected?

3.3.7 states that core uplift force will be reduced but 3.3.8.1 states there is an increase in core differential pressure. ??

3.4.1 states there is no direct effect on SG tube integrity but the next sentence states an increase in RCS temperature may be required. ?? Are there any implications with 3.4.2 where the existing analyses are stated to be bounding?

3.4.2.4 has a reduced circulation ratio but 3.4.2.5 has an increase in secondary side fluid velocity. ??

3.5.2.1 What is the required condensate quantity. What temperature do procedures reference for initiating SDC systems.

3.6.4 The bounding break is downstream of the MSIV?

4.1.2 Why is there no impact on tube plugging assumptions?

4.2.1.1 Does the increased power change any timing and, if so, what is the effect? If not, why not?

4.2.2.4 What is the analysis of record and is the the analysis that is part of the licensing basis? If so, how do you justify its being less severe than the source term? Ditto 4.2.2.5 and 4.2.2.6.

Page 36, 15.1.1.4 Why does the power uprate have no impact on any of the acceptance criteria? (You state because there is no trip associated with the event.)

Page 37, 15.1.2.3 Are you saying the power change has no impact on DNBR?

Page 39, 15.1.3.1B Does time of trip change? If so, does this change any other parameters?

Page 39, 15.2.1.3 ". 3458 MW vs 98.6% of 3458 MW?

Page 43, 15.3.3.1 ".

Page 44, 15.3.3.2 and 15.3.3.3 ". Also, how is 15.3.3.3 more bounding?

Page 45, 15.4.1.3 Don't understand why choice of initial power is insignificant.

15.4.1.4 Is Xenon of any influence?

15.4.1.5 Operating rather than operational?

Page 15.8.1 Are there any timing changes that need consideration?

5.1, 4th paragraph. I don't understand the statement. Do I have a capability to add to RCS water during a blackout and is RCS leakage of any concern?

7.0, 1st long paragraph. How does continued compliance lead to a conclusion that there is no increase in probability?

Item 2. Is there any possibility of drift or mistakes in calibration?