

October 22, 2003

Mr. Harold B. Ray  
Executive Vice President  
Southern California Edison Company  
San Onofre Nuclear Generating Station  
P.O. Box 128  
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 -  
REQUEST FOR ADDITIONAL INFORMATION REGARDING STEAM  
GENERATOR PRESSURE-LOW ALLOWABLE VALUE (TAC NOS. MC0200  
AND MC0201)

Dear Mr. Ray:

By letter dated July 28, 2003, Southern California Edison Company submitted for NRC staff review proposed change number 545, "Request to Revise Technical Specifications 3.3.1 and 3.3.5." In this amendment proposal, you requested to revise Technical Specification 3.3.1, "RPS Instrumentation - Operating," and 3.3.5, "ESFAS Instrumentation." Specifically, the changes would replace the requirement for the Steam Generator Pressure - Low allowable value from its current value of 729 psia to a revised value of 717 psia.

The staff has completed its preliminary review of your submittal, and has identified a number of items for which additional information is needed to continue its review. The enclosed request for additional information contains questions that need your response. We request that the additional information be provided within 60 days of receipt of this letter. This 60-day response time frame was discussed with Mr. Jack Rainsberry of your staff on October 14, 2003. If circumstances result in the need to revise your response date, or if you have any questions, please contact me at 301-415-8450.

Sincerely,

**/RA/**

Bo M. Pham, Project Manager, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosures: Request for Additional Information

cc w/encls: See next page

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San Onofre Nuclear Generating Station, Units 2 and 3

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REQUEST FOR ADDITIONAL INFORMATION

SOUTHERN CALIFORNIA EDISON COMPANY

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

STEAM GENERATOR LOW PRESSURE ALLOWABLE VALUE

DOCKET NOS. 50-361 AND 50-362

The following questions are provided after a preliminary review of Southern California Edison's (SCE's) submittal dated July 28, 2003, proposed change number 545, "Request to Revise Technical Specifications 3.3.1 and 3.3.5."

1. Please show that the margin between the proposed Allowable Value and the Analytical Limit (AV/AL) is sufficient to accommodate all applicable uncertainties, including uncertainties not addressed in channel testing. For example: the calibration of the steam generator (SG) Pressure transmitters is not adjusted or confirmed in the channel check, but it has an obvious influence over the value of SG pressure at which channel trip actually occurs. Another example: testing is performed under whatever environmental conditions happen to be in effect at the time of the test, but a change in environment to the design basis limit could introduce additional uncertainty in channel calibration. Note that the setpoint calculation (Attachment G to the SCE letter) does not appear to take either of the effects in the foregoing examples into account.
2. Please indicate what potential influences are not addressed in channel testing, and explain how they are accommodated in the AV/AL margin.
3. The setpoint calculation identifies numerous assumptions, many of which assert specific quantitative data, for which no substantiation or justification is provided (Section 3). The calculation also relies extensively upon memoranda and other documentation that do not appear to be subject to formal verification and quality control (Section 5). Please explain how the adequacy of the calculations is ensured despite these apparent deficiencies.
4. Please provide a copy of SCE Engineering Design Standard JS-123-103C, Revision 1, and show that the setpoint calculation is in accordance with that standard and that any deviation from the standard is documented and justified. Please note the following concerns:
  - a. Enclosure 2 to the referenced letter indicates that the proposed Allowable Value is based, in part, upon a reduced uncertainty estimate which is itself based upon a setpoint methodology derived from Revision 1 of SCE Engineering Design Standard JS-123-103C. It does not directly state that the Allowable Value was derived in accordance with the design standard. (See the second paragraph of Section 4.0, on page 3 of the licensee's Enclosure 2.) The footnote associated with the referenced paragraph indicates that Revision 0 of the design standard was reviewed by an NRC inspection team in 1991, and cites an NRC inspection

report transmitted via letter dated April 12, 1991 as documentation. The footnote identifies some of the changes from Revision 0 to Revision 1, but does not provide any detail.

- b. The setpoint calculation, Attachment G to the SCE letter, lists the SCE Engineering Design Standard as reference #64. It does not indicate that the calculation is based upon this design standard. It cites the design standard only as a source of general information (Sections 1.2 and 2.0), and as a reference for a reduction of the channel uncertainty value (Section 4.5-VI).
- c. The NRC letter of April 12, 1991, and the Notice of Violation and the Inspection Report attached to it indicate that the methodology used in the computation of certain specific values is acceptable. They do not identify any particular methodology specification, and they do not address the acceptability of the methodology for other applications. The report does mention JS-123-103C Revision 0 (page 20, formal citation on page 25), but indicates that it has been used only as a non-mandatory guidance document. The report does not indicate that this document was itself reviewed for acceptability as a basis for setpoint and Allowable Value calculations in general.
- d. The staff therefore does not find from the information provided to date that the methodology employed in the derivation of the proposed Allowable Value has been previously reviewed or accepted by the NRC. The staff does not find a firm connection between the submitted calculation and the design standard addressed in the licensee's Enclosure 2. The staff does not find that the design standard has ever been reviewed by the NRC for general use, and does find that the current revision has never been submitted to the NRC for review. The staff does not find that the brief description of the changes in the design standard from Revision 0 to Revision 1 provides sufficient information to permit evaluation of the changes.