

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-361 San Onofre Nuclear Station, Unit 2, Southern California  
 50-362 San Onofre Nuclear Station, Unit 3, Southern California  
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DOCKET #  
 05000361  
 05000362

SUBJECT: Requests approval of proposed Tech Spec change re ESF  
 actuation sys instrumentation & ECCS subsystems by 821230.  
 Formal request for amend of Licenses NPF-10 & NPF-15 will be  
 submitted by 830117.

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K. P. BASKIN  
MANAGER OF NUCLEAR ENGINEERING,  
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December 29, 1982 \*

TELEPHONE  
(213) 572-1401

Director, Office of Nuclear Reactor Regulation  
Attention: Mr. George W. Knighton, Branch Chief  
Licensing Branch No. 3  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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Per: Jean Lee

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
San Onofre Nuclear Generating Station  
Units 2 and 3

Enclosed for your review and approval is a proposed change to  
Technical Specification Sections 3/4.3.2 (Table 3.3-5) ENGINEERED SAFETY  
FEATURES ACTUATION SYSTEM INSTRUMENTATION and 3/4.5.2 ECCS SUBSYSTEMS - Tavg  
GREATER THAN OR EQUAL TO 350°F for SONGS Units 2 and 3.

This proposed change will mitigate the consequences of simultaneous  
actuation of Safety Injection Actuation Signal and Recirculation Actuation  
Signal which was discussed in SCE's letter of December 28, 1982. The proposed  
change will delete the requirement for automatic closing of the ECCS miniflow  
valves upon receipt of a Recirculation Actuation Signal or Test Signal.

\* ~~December~~ It is respectfully requested that the proposed changes be approved  
on ~~January~~ 30, 1982 to facilitate implementation of the design change which  
SCE committed to make prior to try into Mode 1 on Unit 2 by letter dated  
December 29, 1982. A formal request for an amendment to Operating Licenses  
NPF-10 and NPF-15 will be transmitted to the NRC during the week of  
January 17, 1983. This change has been determined to be a Class II change in  
accordance with 10 CFR 170.22. A check for \$1,600.00 will be included with  
the formal request.

If you have any questions concerning the enclosed information,  
please call me.

Very truly yours,

KP Baskin

cc: Mr. R. H. Engelken  
Regional Administrator, Region V  
Office of Inspection and Enforcement

Mr. H. Rood, Project Manager  
Licensing Branch No. 3

Boat  
13001

8301040285

### Reason for Proposed Change

The proposed change permits removal of the recirculation Actuation Signal (RAS) from the ECCS miniflow isolation valves (2HV9306, 2HV9307, 2HV9347, 2HV9348 for Unit 2, and 3HV9306, 3HV9307, 3HV9347, 3HV9348 for Unit 3).

In the event of spurious RAS with SIAS, this change will prevent rapid damage (seizing) of the multi-stage HPSI pumps due to the deadheading which would otherwise occur. The LPSI and containment spray pumps are also affected but are not a concern since deadheading of these single stage pumps will not result in pump damage. Operator action to prevent HPSI damage from deadheading in the absence of this change would be required within the first 30 seconds (actual seizing could occur in as little as 2 minutes), which is considered insufficient as a long-term corrective action. Preventing the deadhead conditions by removing the automatic closure signal to the miniflow isolation valves eliminates the need for rapid operator action to protect the HPSI pumps and is therefore expected to increase HPSI availability.

### Safety Evaluation

As discussed in the Reason for Proposed Change, removal of the RAS automatic closure signal to the ECCS miniflow isolation valves is expected to increase HPSI availability by precluding deadheading as a result of spurious RAS with SIAS. Manual operator action from the control room will then be required in lieu of automatic actuation to close the miniflow isolation valves during actual accident conditions. The most limiting accident for manual operator action of the affected valves will be a large break loss of coolant accident (LOCA) wherein recirculation from the containment sump could occur in approximately 18.5 minutes. Isolation of the ECCS miniflow lines is required for the recirculation phase of a LOCA to prevent transport of potentially contaminated sump water to the atmosphere-vented refueling water storage tanks. For the largest break LOCA and most limiting single failure in terms of flow rate to the tanks (one LPSI pump failing to trip on RAS), sump water could arrive at the tank approximately 2 minutes post-RAS; at least one isolation valve in each miniflow line (there is one line per ECCS train) must be shut by this time. Closure of the miniflow isolation valves requires a maximum of 40 seconds per valve (this limit is in the ASME Inservice Test Program). Therefore a worst case time of approximately 20 minutes is available before at least one valve per miniflow line must be closed. For smaller LOCAs, considerably more time is available before recirculation begins (up to several hours). For steam or feedwater line breaks, recirculation of reactor coolant would not occur (since the reactor coolant system is not breached), and no closure of the ECCS miniflow isolation valves is required. Administratively, closure will be effected upon receipt of the RAS pretrip alarm (in order to ensure isolation is not performed prematurely) which will occur at least 6 minutes before miniflow isolation must be complete. Since closure of the ECCS miniflow isolation valves is performed by key switches located on the control room ECCS panel, which is already manned, there is considered to be adequate time available for the operator actions required

(i.e., turn two keyswitches). Further, since there are two isolation valves in each miniflow line, failure to isolate the line by at least one of the valves within the time available is considered to be very unlikely.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-62 and NPF-15-62 does not present significant hazard considerations not described or implicit in the Final Safety Analysis; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station or the environment as described in the NRC Final Environmental Statement.

ELP:6621

DESCRIPTION OF PROPOSED CHANGE NPF-10-62 AND  
NPF-15-62 AND SAFETY ANALYSIS

This is a request to revise Appendix A, Technical Specifications.

Existing Specifications

Section 3/4.3.2 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

Table 3.3-5

6. Refueling Water Storage Tank-Low

a. RAS

- |                                  |       |
|----------------------------------|-------|
| (1) Containment-Sump Valves Open | 50.7* |
| (2) ECCS Miniflow Valves Shut    | 40.7* |

Section 3/4.5.2 ECCS SUBSYSTEMS -Tavg GREATER THAN OR EQUAL TO 350°F

Item 4.5.2.e

3. Verifying that on a Recirculation Actuation Test Signal, the containment sump isolation valves open and that recirculation valves to the refueling water tank close.

Proposed Specifications

Section 3/4.3.2

6. Refueling Water Storage Tank - Low

a. RAS

- |                                  |       |
|----------------------------------|-------|
| (1) Containment Sump Valves Open | 50.7* |
|----------------------------------|-------|

Section 3/4.5.2

Item 4.5.2.e

3. Verifying that on a recirculation Actuation Test Signal, the containment sump isolation valves open.