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 FACIL:50-362 San Onofre Nuclear Station, Unit 3, Southern Californ 05000362
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 KNIGHTON,G.W. Licensing Branch 3

SUBJECT: Forwards proposed change to License Condition 2.C(12)b,to
 License NPF-15, "Fire Protection," for review & approval.
 Formal request for amend will be submitted during wk of
 830711.

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K. P. BASKIN

MANAGER OF NUCLEAR ENGINEERING,
SAFETY, AND LICENSING

July 1, 1983

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

Gentlemen:

Subject: Docket No. 50-362
San Onofre Nuclear Generating Station
Unit 3

Enclosed for your review and approval is a copy of a proposed change to License Condition 2.C(12)b, Fire Protection, of Operating License NPF-15 for San Onofre Nuclear Generating Station Unit 3. License Condition 2.C(12)b requires, in part, that, prior to exceeding five (5) percent power, Southern California Edison Company (SCE) submit a license amendment request to reflect in the Technical Specifications the addition of the following fire protection equipment:

1. Fire detection in fire zones 11, 28, 45, 62 and 72.
2. Additional sprinklers in the AFW pump room.
3. Fire detection and portable extinguishers in the Technical Support Center (TSC).

The required inclusion of fire extinguishers to the technical specifications is inconsistent with Standard Technical Specifications. The proposed change resolves this inconsistency by deleting from the License Condition the requirement to include the TSC fire extinguishers in Technical Specifications. SCE's letter dated April 15, 1983 submitted a License amendment to include in Technical Specifications the fire protection equipment specified by License Condition 2.C(12)b with the exception of the TSC fire extinguishers. At that time, as stated in the April 15, 1983 submittal, SCE considered that this license amendment request fully satisfied the License Condition 2.C(12)b requirement to request a license amendment. Because of the above noted inconsistency in the existing License Condition, one could interpret that the April 15, 1983 license amendment request does not fully satisfy this requirement. The proposed change is therefore submitted to resolve the inconsistency in the License Condition and remove any question about its satisfaction prior to Unit 3 exceeding 5% power.

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July 1, 1983

SCE's letter dated June 22, 1983 anticipated that Unit 3 will be ready to exceed 5% power by August 19, 1983. In light of this, the proposed change is submitted by this letter, rather than a formal amendment application, to facilitate the required pre-noticing in the Federal Register and processing of the amendment by August 19, 1983. A formal request for an amendment to Operating License NPF-15 will be submitted during the week of July 11, 1983. In accordance with 10 CFR 170.22, this change has been determined to constitute a Class II amendment. A check for \$1,200.00 corresponding to this determination is enclosed.

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

Very truly yours,

M. D. Medford for KPB

Enclosures

cc: Harry Rood, NRC (To be opened by addressee only)
Joseph O. Ward, California Department of Health Services

DESCRIPTION OF PROPOSED CHANGE NPF-15-78 AND
SAFETY ANALYSIS

This is a request to revise License Condition 2.C(12) of Operating License NPF-15.

Existing License Condition

(12) Fire Protection (Section 9.5.1, SER, SSER #4, SSER #5,
Section 1.12, SSER #5)

- a. SCE shall maintain in effect and fully implement all provisions of the approved Fire Protection Plan as amended through Amendment 12 and the NRC staff's Fire Protection Review described in the SER, Supplements 4 and 5 to the SER, and in the Safety Evaluation issued with this license. In addition, SCE shall meet the technical requirements of Section III.G, "Fire Protection of Safe Shutdown Capability," III.J "Emergency Lighting," and III.O "Oil Collection System for Reactor Coolant Pump" of Appendix R to 10 CFR 50.
- b. Prior to exceeding five (5) percent power, SCE shall complete the installation of the following items and shall submit a license amendment request to add items 1, 3 and 5 to the Technical Specifications (Appendix A to this license).
 1. Provide fire detection in fire zones 11, 28, 45, 62, and 72.
 2. Install metal shrouding on the AFW turbine lube oil system.
 3. Install additional sprinklers in the AFW pump room.
 4. Provide a 1 1/2 hour fire damper for one of the three charging pump rooms.
 5. Provide fire detection and portable extinguishers in the technical support center.

Proposed License Condition

(12) Fire Protection (Section 9.5.1, SER, SSER #4, SSER #5,
Section 1.12, SSER #5)

- a. SCE shall maintain in effect and fully implement all provisions of the approved Fire Protection Plan as amended through Amendment 12 and the NRC staff's Fire Protection Review described in the SER, Supplements 4 and 5 to the SER, and in the Safety Evaluation issued with this license. In addition, SCE shall meet the technical requirements of Section III.G, "Fire Protection of Safe Shutdown Capability," III.J "Emergency Lighting," and III.O "Oil Collection System for Reactor Coolant Pump" of Appendix R to 10 CFR 50.

- b. Prior to exceeding five (5) percent power, SCE shall complete the installation of the following items and shall submit a license amendment request to add items 1, 3 and 5 (i) to the Technical Specifications (Appendix A to this license).
 1. Provide fire detection in fire zones 11, 28, 45, 62, and 72.
 2. Install metal shrouding on the AFW turbine lube oil system.
 3. Install additional sprinklers in the AFW pump room.
 4. Provide a 1 1/2 hour fire damper for one of the three charging pump rooms.
 5. Provide (i) fire detection and (ii) portable extinguishers in the technical support center.

Reason For Proposed Change

The addition of fire extinguishers to technical specifications as required by the existing License Condition is inconsistent with Standard Technical Specifications.

Safety Analysis

The proposed change discussed above shall be deemed to involve a significant hazards consideration if there is a positive finding in any of the following areas.

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change is administrative in nature. It clarifies a license condition requirement for a license amendment request making it consistent with provisions of Standard Technical Specifications. It, therefore, has no impact on the probability or consequences of any previously evaluated accident.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated.

Response: No

As stated above the proposed change is administrative in nature. It, therefore, does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety.

Response: No

The proposed change is administrative in nature and has no effect on any margin of safety.

Safety and Significant Hazards Determination

Based on the Safety Evaluation, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; and (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 on the environment as described in the NRC Final Environmental Statement.

PWS:8004