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SUBJECT: Responds to Generic Ltr 90-06, "Resolution of Generic Issue  
 70 re PORV & Block Valve Reliability" & Generic Issue 94,  
 "Addl Low Temp Overpressure Protection for LWRs." PORV  
 related Tech Spec changes inapplicable.

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December 21, 1990

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
Response to Generic Letter 90-06, "Resolution of  
Generic Issue 70, 'Power-Operated Relief Valve and  
Block Valve Reliability,' and Generic Issue 94,  
'Additional Low-Temperature Overpressure Protection for  
Light-Water Reactors,' Pursuant to 10 CFR 50.54(f)"  
San Onofre Nuclear Generating Station  
Units 2 and 3

This letter is Southern California Edison's (SCE) response to  
Generic Letter 90-06 (GL 90-06) for the San Onofre Nuclear  
Generating Station (SONGS) Units 2 and 3. The generic letter  
delineates the NRC staff positions resulting from the resolutions  
of Generic Issue 70 (GI-70), "Power-Operated Relief Valve and  
Block Valve Reliability," and Generic Issue 94 (GI-94),  
"Additional Low-Temperature Overpressure Protection for  
Light-Water Reactors."

Generic Issue 70 concerns the reliability of power-operated  
relief valves (PORVs), their block valves, and their safety  
significance in pressurized water reactors. SONGS Units 2 and 3  
do not have PORVs, therefore, the recommended PORV related  
technical specification (TS) changes do not apply.

Generic Issue 94 concerns the safety-significance of low-tempera-  
ture overpressure (LTOP) transients that have occurred after the  
resolution and implementation of Unresolved Safety Issue (USI)  
A-26, "Reactor Vessel Pressure Transient Protection (Overpressure  
Protection)." The NRC staff has determined that LTOP system  
unavailability is the dominant contributor to risk from LTOP  
transients. To increase LTOP system availability, the NRC staff  
recommends a change to the current TS for Overpressure  
Protection. The recommended change reduces the Allowed Outage  
Time (AOT) for a single channel from seven days to 24 hours when  
the plant is operating in MODES 5 and 6 with the head on the  
reactor vessel.

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This NRC request affects TS 3/4.4.8.3.1, "Overpressure Protection Systems..." for both Units 2 and 3. In response, we will prepare an amendment request to reduce the AOT from seven days to 24 hours in Action b of TS 3/4.4.8.3.1 for MODES 5 and 6 with the head on the reactor vessel. As requested in GL 90-06, this TS change submittal will be made by the end of the Unit 2 Cycle 6 refueling outage scheduled for July to September 1991.

The generic letter also requests that restrictions previously imposed as part of the USI A-26 resolution be implemented now if they are not yet incorporated in the technical specifications. Specifically, restrictions on differential temperature for reactor coolant pump (RCP) start and safety injection pump operability should be added to the technical specifications.

The proposed RCP start restriction concerns the challenge that would occur to the LTOP system due to an energy addition to the RCS if the secondary system temperature is greater than the RCS cold leg temperature, and if this temperature differential is in excess of the LTOP design basis. Thus, the restriction protects the reactor vessel and RCS from energy additions in excess of the LTOP design basis. Units 2 and 3 already include this recommended differential temperature restriction for starting the RCPs in TS 3/4.4.1.3, "Hot Shutdown," and TS 3/4.4.1.4.1, "Cold Shutdown - Loops Filled."

The proposed safety injection operability restriction concerns the challenge that would occur to the LTOP system due to a mass addition to the RCS in excess of the design basis. The mass additions of concern are from the safety injection pumps and the charging pumps. The design basis for the Units 2 and 3 LTOP systems -- the Residual Heat Removal Systems Safety Relief Valve -- assumes the unrestricted flow from two High Pressure Safety Injection (HPSI) pumps and three charging pumps without letdown (Updated Final Safety Analysis Report, Section 5.2.2.11, "Overpressure Protection During Low Temperature Conditions"). The guidance provided in GL 90-06 explicitly states "...pumps in excess of this design basis assumption for LTOP not be capable of providing makeup or injection to the RCS." Units 2 and 3 each have three HPSI and three charging pumps. Hence, SCE will submit a TS amendment to restrict the number of HPSI pumps operable in TS 3/4.1.2.3, "Charging Pump - Shutdown," and TS 3/4.5.3, "ECCS Subsystems - Tavg Less Than 350°F," as requested in GL 90-06. This TS change submittal will be made by the end of the Unit 2 Cycle 6 refueling outage scheduled for July to September 1991.

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

Respectfully submitted,

By:

*FR Nandy*

F. R. Nandy  
Manager, Nuclear Licensing

Subscribed and sworn to before me this

*21st*

day of December 1990.

*Mariane Sanchez*  
Notary Public in the State  
of California



TDM\GL90-06.NRC

cc: J. B. Martin, Regional Administrator, NRC Region V  
C. Caldwell, NRC Senior Resident Inspector, San Onofre  
Units 1, 2 & 3