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SUBJECT: Requests temporary waiver of compliance w/Tech Specs 3.3.1,  
 "Reactor Protective Instrumentation" & 3.3.2, "ESF Actuation  
 Sys Instrumentation."

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February 8, 1991

Mr. John B. Martin  
Regional Administrator  
U.S. Nuclear Regulatory Commission, Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, California 94596

Subject: Docket Nos. 50-361 and 50-362  
Request for Temporary Waiver of Compliance  
Steam Generator Level Instrumentation  
San Onofre Nuclear Generating Station, Units 2 and 3

The purpose of this letter is to document the Temporary Waiver of Compliance requested by SCE and granted by the NRC on February 7, 1991 for the San Onofre Nuclear Generating Station, Units 2 and 3.

(1). Requirements for which the Waiver is requested:

The San Onofre Nuclear Generating Station, Units 2 and 3, is requesting a Temporary Waiver of Compliance to portions of Technical Specifications (TS) 3.3.1 (Reactor Protective Instrumentation) and 3.3.2 (Engineered Safety Feature Actuation System Instrumentation). This is requested since certain Steam Generator Level Instrumentation has been determined to not meet the Operability requirements of the TS although it is capable of performing its intended safety function.

The instrumentation discussed in this Request satisfies the functions of the Steam Generator high and low level Reactor trips (TS 3.3.1, Table 3.3-1, Functional Units 8 and 11), and the Steam Generator low level actuation for the Emergency Feedwater Actuation System (TS 3.3.2, Table 3.3-3, Functional Units 8c and 8d). Although these components are capable of performing their intended safety function, the determination of inoperability places both Unit 2 and Unit 3 in Limiting Condition for Operation 3.0.3 for the above two discussed TS sections. Granting this

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Temporary Waiver of Compliance will have the effect that the Steam Generator Level Instrumentation will be considered Operable with regards to the above identified concern for the duration of the Waiver.

The setpoints for the affected Steam Generator Level Instruments are currently being reset such that the instrumentation will be restored to an Operable condition. This work is anticipated to be completed by February 9, 1991. Therefore, it is requested that the Temporary Waiver of Compliance be issued effective through February 9, 1991.

(2). Circumstances surrounding the current situation:

On February 4, 1991, discrepancies were identified in calibration calculations for the Steam Generator Level measurement channels which adversely affect the trip setpoints for Reactor trip and Emergency Feedwater actuation. Non-Conformance Reports (NCRs) 91020009, 91020010, 91020011 and 91020012 were initiated to document this discrepancy. These errors consist of incorrect assumptions used in calculating thermal expansion of elements in the Steam Generator Level Instrumentation and misinterpretation of NSSS Vendor information relating to the location of Steam Generator instrument lower level narrow range taps. Further review of the applicable calculations and engineering documents has identified conservatisms that will accommodate the effects of the errors introduced by this apparent nonconformance such that the Steam Generator Level Instrumentation continues to perform the intended safety function.

Prompt action must be taken on this Request to prevent shutdown under TS 3.0.3. Since this occurrence was only discovered recently, while both Units were operating at full power, this situation could not have been avoided by prior actions or planning.

(3). Compensatory Actions necessary:

Instrument drift is being monitored by the Redundant Instrument Monitoring System (RIMS) at least daily to ensure the reduced drift observed for the Steam Generator Level Instrumentation and credited in the following Safety Significance Evaluation remains valid.

(4). Preliminary Safety Significance Evaluation:

The preliminary engineering evaluation of this occurrence revealed, as discussed above, that certain conservatisms will compensate for the identified discrepancies in the design calculations. Specifically, San Onofre 2 and 3 employs the RIMS which monitors redundant channels of like instrumentation.

Comparing the current actual Steam Generator Level instrument drift with the drift assumed in the design calculations reveals an available margin which when combined with existing margin in the existing calculations will accommodate the margin reduction potentially imposed by the discrepancies in the setpoint calculations. Since, in balance, the margin of safety has not been reduced, it is concluded that the Safety Analysis remains valid and therefore there is negligible safety significance due to these circumstances.

(5). Justification for the duration of the Request:

It is requested that the Temporary Waiver of Compliance be issued effective through February 9, 1991. This will ensure that the work can be completed in a safe and controlled manner.

The duration for this Waiver is considered justified since there is negligible safety significance associated with operation in this configuration through February 9, 1991. While the staff of San Onofre is committed to conservatively implement the requirements of the TS, we believe that commencement of a plant shutdown in accordance with TS 3.0.3 in response to this occurrence would be contrary to the objective of that commitment, which is to ensure maximum safety and to minimize risk. This philosophy is considered to be consistent with Generic Letter 87-09, which notes in connection with shutdowns resulting from missed surveillance intervals that "...it usually would be preferable to restore (the system or component) to service before making the change in plant operating conditions."

(6). Basis for No Significant Hazards Conclusion:

10 CFR 50.92 defines that no significant hazards will occur if operation of the facility in accordance with the Temporary Waiver of Compliance does not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

As discussed previously, the margin of safety for actuating either a Reactor trip or an Emergency Feedwater Actuation signal is preserved given the comparison of the current amount of instrument drift, as indicated by the RIMS, and that allowed by the design calculations including the existing margin allowance. Since the potential for setpoint error is the issue affected by this occurrence, there is neither any significant increase in the probability or consequences of an accident previously evaluated

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nor the possibility of a new or different kind of accident from any accident previously evaluated.

(7). Basis for No Irreversible Environmental Consequences:

This Request does not involve a change in the installation or use of the facilities or components located within the restricted areas as defined in 10 CFR 20. It has been determined that this Temporary Waiver of Compliance involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. Accordingly, this Temporary Waiver of Compliance meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the granting of the Temporary Waiver of Compliance.

The San Onofre Nuclear Generating Station Onsite Review Committee (OSRC) has reviewed and approved this Request for Temporary Waiver of Compliance.

If you have any questions or comments, or if you would like additional information, please let me know.

Sincerely,

H E moy —

cc: R. P. Zimmerman, USNRC, Region V  
C. W. Caldwell, USNRC Senior Resident Inspector  
L. E. Kokajko, USNRC Project Manager, Units 2 and 3, NRR