

## ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9104080006 DOC.DATE: 91/03/22 NOTARIZED: NO DOCKET #  
 FACIL:50-361 San Onofre Nuclear Station, Unit 2, Southern Californ 05000361  
 AUTH.NAME AUTHOR AFFILIATION  
 MORGAN,H.E. Southern California Edison Co.  
 KRIEGER,R.W. Southern California Edison Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
 MARTIN,J.B. Region 5 (Post 820201)

SUBJECT: Requests temporary waiver of compliance from Tech Spec  
 3.1.2.2, "Reactivity Control Sys - Flow Paths - Operating"  
 to allow sufficient time to repair cracked gravity feed  
 boration flow path.

DISTRIBUTION CODE: IE01D COPIES RECEIVED:LTR 1 ENCL 0 SIZE: 4  
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

## NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD5 PD	1 1	KOKAJKO,L.	1 1
INTERNAL:	ACRS	2 2	AEOD	1 1
	AEOD/DEIIB	1 1	AEOD/TPAB	1 1
	DEDRO	1 1	NRR MORISSEAU,D	1 1
	NRR SHANKMAN,S	1 1	NRR/DLPQ/LPEB10	1 1
	NRR/DOEA/OEAB	1 1	NRR/DREP/PEPB9D	1 1
	NRR/DRIS/DIR	1 1	NRR/DST/DIR 8E2	1 1
	NRR/PMAS/ILRB12	1 1	NUDOCS-ABSTRACT	1 1
	<del>OE-DIR</del>	1 1	OGC/HDS3	1 1
	REG FILE 02	1 1	RGN5 FILE 01	1 1
EXTERNAL:	EG&G/BRYCE,J.H.	1 1	NRC PDR	1 1
	NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,  
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION  
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 24 ENCL 24 <sup>0</sup>

*m/11-11*

RECEIVED  
NRC  
REGION V

*Southern California Edison Company*

1991 MAR 27 AM 9:42

P. O. BOX 128

SAN CLEMENTE, CALIFORNIA 92672

H. E. MORGAN  
VICE PRESIDENT AND SITE MANAGER  
SAN ONOFRE

TELEPHONE  
714-368-9470

March 22, 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 No. 50-361  
Request for Temporary Waiver of Compliance  
Boration Flow Paths  
San Onofre Nuclear Generating Station, Unit 2

The purpose of this letter is to request a Temporary Waiver of Compliance from the requirements of Technical Specification (TS) 3.1.2.2, "Reactivity Control Systems - Flow Paths - Operating," to allow sufficient time to complete repairs to a cracked gravity feed boration flow path without completely satisfying the requirements of TS 3.1.2.2.

A. Requirements for which the waiver is requested:

TS 3.1.2.2 requires that, in Modes 1 through 4, "... the following boron injection flow paths to the RCS via the charging pump(s) shall be OPERABLE:

a. At least one of the following combinations:

- 1) One boric acid makeup tank, with the contents in accordance with Figure 3.1-1, its associated gravity feed valve, and boric acid makeup pump.
- 2) Two boric acid makeup tanks, with the combined contents of the tanks in accordance with Figure 3.1-1, their associated gravity feed valves, and boric acid makeup pumps,
- 3) Two boric acid makeup tanks, each with in accordance with Figure 3.1-1, at least one gravity feed valve, their associated gravity feed valves, and at least one boric acid makeup pump, and

b. The flow path from the refueling water storage tank."

9104080006 910322  
PDR ADOCK 05000341  
P PDR

TS-01

March 22, 1991

These combinations of boration flow paths to the Reactor Coolant System (RCS) and boron sources ensure that negative reactivity control is available during each mode of operation. With fewer than the specified combinations of boration flow paths operable, the specified flow paths must be restored to operability within 72 hours or the unit must be shutdown as detailed in the TS action requirements.

A temporary waiver of the above TS requirements is requested to provide sufficient time for completion of repairs to a pipe in the common gravity feed boration flow path from the boric acid makeup (BAMU) tanks to the charging pumps. The pipe has developed a crack which renders the flow path inoperable. With this flow path inoperable, the TS 3.1.2.2 LCO requiring a gravity feed path from at least one BAMU tank cannot be satisfied. However, during the period of the requested waiver two boration flow paths will remain available as discussed below.

B. Circumstances Surrounding the Current Situation:

On March 20, 1991, at 1400 hours, with Unit 2 in Mode 1 at approximately 60% power, the above discussed gravity feed boration flow path (which is one of two Train B paths) was found to be cracked and leaking at a rate of about 60 drops per minute. SCE conservatively declared this boration flow path inoperable. As a consequence, the TS 3.1.2.2 72-hour action requirement has been entered and repairs to the gravity feed line have been initiated. The repairs consist of removal of a portion of the existing line including the crack and replacing it with a new piece of pipe. All repair work will be in accordance with Section III of the ASME Code. At this time, the following boration flow paths to the suction of the charging pumps are operable per the requirements of TS 3.1.2.2: 1) A BAMU tank and its associated makeup pump (Train A), and 2) the gravity feed flow path from the refueling water storage tanks (Train B).

Current estimates of the time to complete the repair indicate that we may be able to complete the repairs, perform the necessary testing and restore the line to operability within the 72-hour action time limit.

In the event that repairs do not proceed as planned and cannot be completed within the 72-hour TS action time limit, prompt action must be taken on this waiver request to prevent the shutdown required by TS 3.1.2.2. Since this occurrence was recently identified and repairs are being expedited, this situation could not have been avoided by prior actions or planning.

C. Compensatory Actions Necessary:

As described in section B above, two boration flow paths remain operable and functional. During the period of this waiver, SCE will maintain the following operable: 1) the boration flow paths required by TS 3.1.2.2 as discussed in section B above (except as noted below), and 2) any electrical power source or distribution component capable of preventing the remaining Train B boration flow path from fulfilling its design function. During the hydrostatic test of the repair, as required by Section III of the ASME Code, it is possible that

March 22, 1991

it will be necessary to remove the Train A boration flow path (BAMU tank and pump) from service. In such an eventuality, Operations will be prepared to immediately restore the flow path to service should this boration flow path be required.

D. Preliminary Safety Significance Evaluation:

Preliminary engineering evaluation of operation with the BAMU tank gravity feed to the charging pumps removed from service indicate that there is no safety significance to continued operations with this flow path out of service with the above discussed compensatory measures. The basis for this conclusion is that two independent and diverse boron injection flow paths remain operable (or capable of being immediately restored to service) and either flow path is capable of providing sufficient boron to the charging pumps to satisfy the design basis. These two operable flow paths are sufficient to ensure that negative reactivity control consistent with the design basis is available during each mode of normal and emergency facility operation.

E. Justification for the Duration of the Waiver:

It is requested that the temporary waiver of compliance be issued effective through 2 pm PST on March 24, 1991. This will provide sufficient time to repair and verify operability of the BAMU tank to charging pump gravity feed line.

The duration of this waiver is considered justified since there is negligible safety significance associated with operation in this configuration because of the other operable boration flow paths.

F. 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.

The above described compensatory measures provide assurance that the boration capability is sufficient to provide the required shutdown margin for any point in core life and for any previously evaluated accident or event.

It is therefore concluded that operation of the plant in the above described configuration does not involve any significant increase in the probability or consequences of an accident previously evaluated; nor does it create the possibility of a new or different kind of accident from any previously

Mr. John B. Martin

- 4 -

March 22, 1991

evaluated; nor does it represent a significant reduction in a margin of safety.

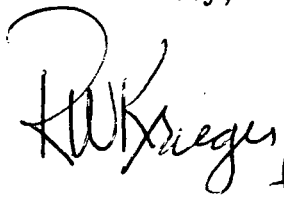
G. Basis for No Irreversible Environmental Consequences:

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 effluent 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 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,

  
R. W. Krieger  
for H. Morgan

cc:

R. P. Zimmerman, USNRC, Region V  
C. W. Caldwell, USNRC Senior Resident Inspector  
L. E. Kokajko, USNRC Project Manager, Unit 2 and 3  
C. M. Trammell, USNRC Senior Project Manager