

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON	)	
COMPANY, <u>ET AL.</u> for a Class 103 License to	)	DOCKET NO. 50-361
Acquire, Possess, and Use a Utilization	)	
Facility as Part of Unit No. 2 of the San	)	Amendment Application
Onofre Nuclear Generating Station	)	No. 45

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90,  
hereby submit Amendment Application No. 45.

This amendment application consists of Proposed Change NPF-10-250 to Facility Operating License No. NPF-10. Proposed Change NPF-10-250 is a request to revise Technical Specification 3/4.3.3.10, "Loose-Part Detection Instrumentation." The proposed change will revise the frequency of loose-part detection instrumentation channel calibration from the currently specified 18 month interval to "refueling interval," to support nominal 24 month fuel cycle operation.

Pursuant to 10 CFR 170.12, the required amendment application fee of \$150 is enclosed.

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PDR ADOCK 05000361  
P DCD

Subscribed on this 25<sup>th</sup> day of April, 1988.

Respectfully submitted,

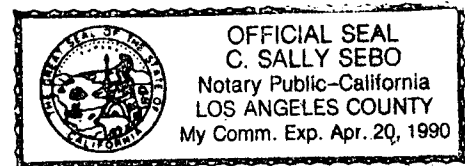
SOUTHERN CALIFORNIA EDISON COMPANY

By: Kenneth P. Barker

Subscribed and sworn to before me this  
25<sup>th</sup> day of April, 1988.

C. Sally Sebo  
Notary Public in and for the County of  
Los Angeles, State of California

My Commission Expires: Apr 20, 1990



Charles R. Kocher  
James A. Beoletto  
Attorneys for Southern  
California Edison Company

By: James A. Beoletto

SAN DIEGO GAS & ELECTRIC COMPANY

By:

*H. D. Cotton*

David R. Pigott  
Samuel B. Casey  
Orrick, Herrington & Sutcliffe  
Attorneys for San Diego  
Gas & Electric Company

By:

*David R. Pigott*

Subscribed and sworn to before me this  
7 day of April.

*Stephanie Effitt*

Notary Public in and for the City  
and County of San Diego, California

STATE OF CALIFORNIA  
COUNTY OF San Diego

} SS.

On 4/7/88, before me, the undersigned, a Notary Public in and for  
said State, personally appeared J D Cotton and

\_\_\_\_\_, personally known to me (or proved to me on the  
basis of satisfactory evidence) to be the persons who executed the within instrument as \_\_\_\_\_

Dr Vri President and \_\_\_\_\_ Secretary, on behalf of \_\_\_\_\_  
San Diego Gas & Electric

the corporation therein named, and acknowledged to me that  
such corporation executed the within instrument pursuant to  
its by-laws or a resolution of its board of directors.

WITNESS my hand and official seal.

Signature

Stephanie E Hitt



(This area for official notarial seal)

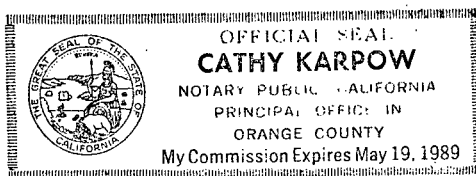
THE CITY OF ANAHEIM

By: *Jason W. Davis*

Alan R. Watts  
Rourke & Woodruff  
Attorneys for the City of Anaheim

By: *Alan R Watts*


Subscribed and sworn to before me this  
1<sup>st</sup> day of April, 1988.



*Cathy Karpow*  
Notary Public in and for the County  
of Orange, State of California

THE CITY OF RIVERSIDE

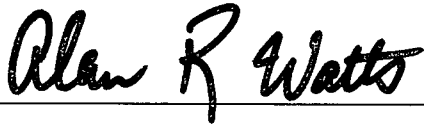
By: \_\_\_\_\_



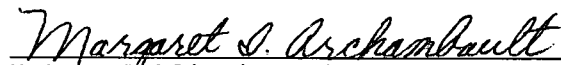
Bill D. Carnahan  
Public Utilities Director

Alan R. Watts  
Rourke & Woodruff  
Attorneys for the City of Riverside

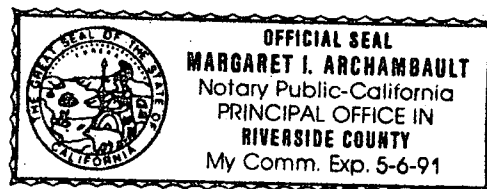
By: \_\_\_\_\_



Subscribed and sworn to before me this  
4th day of April, 1988.



Notary Public in and for the County of  
Riverside, State of California



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON	)	
COMPANY, <u>ET AL.</u> for a Class 103 License to	)	DOCKET NO. 50-362
Acquire, Possess, and Use a Utilization	)	
Facility as Part of Unit No. 3 of the San	)	Amendment Application
Onofre Nuclear Generating Station	)	No. 31

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90,  
hereby submit Amendment Application No. 31.

This amendment application consists of Proposed Change NPF-15-250 to Facility Operating License No. NPF-15. Proposed Change NPF-15-250 is a request to revise Technical Specification 3/4.3.3.10, "Loose-Part Detection Instrumentation." The proposed change will revise the frequency of loose-part detection instrumentation channel calibration from the currently specified 18 month interval to "refueling interval," to support nominal 24 month fuel cycle operation.

Pursuant to 10 CFR 170.12, the required amendment application fee of \$150 is enclosed.

Subscribed on this 25<sup>th</sup> day of April, 1988.

Respectfully submitted,

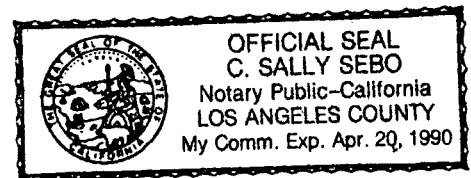
SOUTHERN CALIFORNIA EDISON COMPANY

By: Winifred P. Bush

Subscribed and sworn to before me this  
25<sup>th</sup> day of April, 1988.

C. Sally Sebo  
Notary Public in and for the County of  
Los Angeles, State of California

My Commission Expires: Apr 20, 1990



Charles R. Kocher  
James A. Beoletto  
Attorneys for Southern  
California Edison Company

By: James A. Beoletto



SAN DIEGO GAS & ELECTRIC COMPANY

By: *J.D. Cotton*

David R. Pigott  
Samuel B. Casey  
Orrick, Herrington & Sutcliffe  
Attorneys for San Diego  
Gas & Electric Company

By: *David R. Pigott*

Subscribed and sworn to before me this  
7 day of April, '88.

*Stephanie E. Hill*  
Notary Public in and for the City  
and County of San Diego, California

STATE OF CALIFORNIA }  
COUNTY OF San Diego } SS.

On 4/7/88, before me, the undersigned, a Notary Public in and for  
said State, personally appeared LD Cotton and

\_\_\_\_\_, personally known to me (or proved to me on the  
basis of satisfactory evidence) to be the persons who executed the within instrument as \_\_\_\_\_

De Vice President and \_\_\_\_\_ Secretary, on behalf of \_\_\_\_\_

San Diego Gas & Electric  
the corporation therein named, and acknowledged to me that  
such corporation executed the within instrument pursuant to  
its by-laws or a resolution of its board of directors.

WITNESS my hand and official seal.

Signature

Stephanie E. Hitt



(This area for official notarial seal)

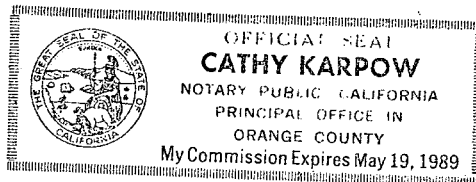
THE CITY OF ANAHEIM

By: *Richard W. Hout*

Alan R. Watts  
Rourke & Woodruff  
Attorneys for the City of Anaheim

By: *Alan R. Watts*

Subscribed and sworn to before me this  
15<sup>th</sup> day of April, 1988.



*Cathy Karpow*  
Notary Public in and for the County  
of Orange, State of California

THE CITY OF RIVERSIDE

By:



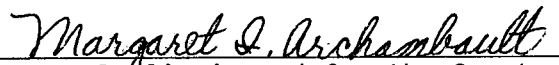
Bill D. Carnahan  
Public Utilities Director

Alan R. Watts  
Rourke & Woodruff  
Attorneys for the City of Riverside

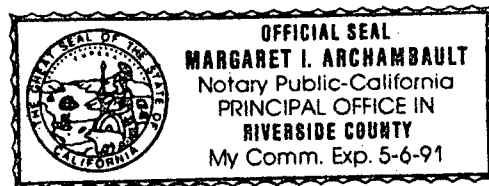
By:



Subscribed and sworn to before me this  
4th day of April, 1988.



Notary Public in and for the County of  
Riverside, State of California



## DESCRIPTION OF PROPOSED CHANGE NPF-10/15-250 AND SAFETY ANALYSIS

This is a request to revise Technical Specification 3/4.3.3.10, "Loose-Part Detection Instrumentation."

### Existing Specifications

Unit 2: See Attachment "A"

Unit 3: See Attachment "C"

### Proposed Specifications

Unit 2: See Attachment "B"

Unit 3: See Attachment "D"

### Description

The proposed change would revise Technical Specification 3/4.3.3.10, "Loose-Part Detection Instrumentation." The loose part detection instrumentation serves to provide early detection of loose metallic parts in the primary system to avoid and/or mitigate damage to the primary system components. The vibration, loose parts, and core internal nuclear channels monitor the major reactor primary system components. The selected locations provide a qualitative indication of vibration throughout the primary system.

Surveillance Requirement 4.3.3.10.c states that each channel of the loose-part detection system shall be demonstrated operable by the performance of a Channel Calibration at least once per 18 months. The proposed change would revise this requirement from the current 18 month interval to an interval at least once per refueling (nominally 24 months). The channel calibration currently performed every 18 months repeats the testing done monthly and also checks the sensors, most of which are located in the containment. Testing these sensors requires the unit to be in a shutdown mode to maintain radiation exposures as low as reasonably achievable.

A maintenance history review was conducted for the Vibration and Loose Parts Monitoring System (V&LPM) for Unit 2 from the period August 8, 1983 to November 1, 1987 and for Unit 3 from April 1, 1984 to November 1, 1987. This review covered the period from the time the plants went into commercial operation to the date of the maintenance history review. The results of the review demonstrated that all the deficiencies, except one, were found from daily and monthly surveillances and alarm indications. The exception, Channel 14, Core Internals, Channel B, failed a common mode rejection section of the 18 month test. This section of the test checks the noise immunity of the different channels. This event is not significant, however, because it indicates that an alarm would be generated sooner than necessary for this channel due to noise effects.

The V&LPM does not perform a safety-related function and is solely a monitoring system. Most failures are detectable through the daily and monthly surveillance tests. This change assures that the system reliability during that time period is not affected.

SONGS 2 has recently entered its first nominal 24-month fuel cycle. SONGS 3 will enter its first nominal 24-month cycle with Cycle 4 startup in mid-1988. Many of the sensors for the system are located within the containment, so access to the containment is required to conduct the testing. In order to maintain radiation exposure as low as reasonably achievable, the unit would need to be in a shutdown mode to conduct this testing. The current 18-month surveillance interval could necessitate a plant shutdown solely for the purpose of performing 18-month surveillance requirements. To avoid the need for an otherwise unnecessary shutdown, the proposed change is required.

#### Safety Analysis

The proposed changes discussed above shall be deemed to involve a significant hazards consideration if there is a positive finding in any one 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 operability of the V&LPM ensures that sufficient capability exists to detect loose metallic parts in the primary system and avoid or mitigate damage to primary system components. The system serves no safety function and is not credited in the accident analyses. The proposed change will revise the frequency of the channel calibration test to an interval at least once per refueling. Most failures of the system are detected during performance of the daily and monthly testing. Therefore, the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The V&LPM is a monitoring system and does not initiate any automatic protective functions. The proposed change extends the surveillance interval (for a test intended to be performed during a refueling outage) to coincide with the refueling outage interval of 24-month fuel cycles. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No

The proposed change extends the 18 month interval for performing the 18 month channel calibration surveillance to refueling intervals. The actual time interval between surveillances will be a function of the plant capacity factor for the particular fuel cycle. For the equilibrium cycle, the fuel cycle length will be 513 effective full power days (EFPD). A production factor of 90% and a 75 day refueling outage would result in an actual cycle length of 21 months. Technical Specification 4.0.2.a permits a maximum allowable extension not to exceed 25% of the current surveillance interval which would accomodate uninterrupted operation for the equilibrium cycle length, except that the Specification 4.0.2 limitation on the application of a 25% extension, such that three consecutive intervals do not exceed 3.25 times the nominal interval, eventually would impact operation. Thus, the proposed change does not represent a radical increase over what is already permitted by technical specifications. Extending the current surveillance interval to a refueling interval is permissible under the Technical Specifications. Extending the surveillance interval for this test does not involve a significant reduction in a margin of safety. A review of the maintenance history of the loose-parts detection system revealed that the majority of the problems found were a result of either the daily or monthly surveillance test. The exception was a channel failed a common mode rejection test during an 18-month surveillance. Hence, the channel would tend to alarm when there was not a real alarm condition present because of noise interference. Therefore, the proposed change will not involve a significant increase in a margin of safety.

#### Safety and Significant Hazards Determination

Based on the above Safety Analysis 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.

ATTACHMENT "A"  
UNIT 2 EXISTING SPECIFICATION