

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA)	
EDISON COMPANY, <u>ET AL.</u> for a Class 103)	Docket No. 50-361
License to Acquire, Possess, and Use)	
a Utilization Facility as Part of)	Amendment Application
Unit No. 2 of the San Onofre Nuclear)	No. 54
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 54.

This amendment application consists of Proposed Technical Specification Change No. NPF-10-259 to Facility Operating License No. NPF-10. Proposed Technical Specification Change No. NPF-10-259 is a request to revise Technical Specification 3/4.6.4.3, "Containment Dome Air Circulators." The proposed change would increase the 18 month surveillance intervals 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 PDC

Subscribed on this 11th day of October, 1988.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

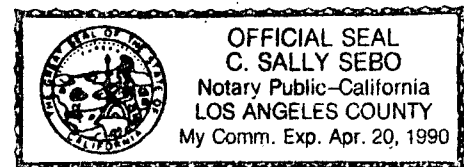
By:

Kenneth P. Parker

Subscribed and sworn to before me this
11th day of October, 1988.

C. Sally Sebo

Notary Public in and for the County of
Los Angeles, State of California



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

By:

James A. Beoletto

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NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA)	
EDISON COMPANY, <u>ET AL.</u> for a Class 103)	Docket No. 50-362
License to Acquire, Possess, and Use)	
a Utilization Facility as Part of)	Amendment Application
Unit No. 3 of the San Onofre Nuclear)	No. 40
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 40.

This amendment application consists of Proposed Technical Specification Change No. NPF-15-259 to Facility Operating License No. NPF-15. Proposed Technical Specification Change No. NPF-15-259 is a request to revise Technical Specification 3/4.6.4.3, "Containment Dome Air Circulators." The proposed change would increase the 18 month surveillance intervals 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 11th day of October, 1988.

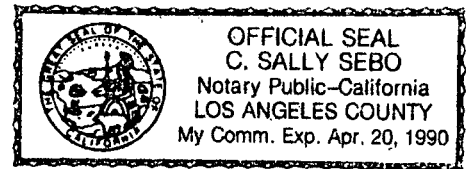
Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Wm. P. Bush

Subscribed and sworn to before me this
11th day of October, 1988.

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



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

By: James A. Beoletto

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CXHANGE NPF-10/15-259

This is a request to revise Technical Specification (TS) 3/4.6.4.3 "Containment Dome Air Circulators."

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 will revise Technical Specification (TS) 3/4.6.4.3 "Containment Dome Air Circulators." This Specification requires two independent dome air circulator trains to be operable in Modes 1 and 2. Containment dome air circulators are provided to ensure adequate mixing of the containment atmosphere following a LOCA. In conjunction with other containment systems, the dome air circulators will prevent localized accumulations of hydrogen from exceeding its flammable limit. TS 3/4.6.4.3 also defines periodic surveillance tests, and action to be taken if the minimum operability requirements are not met. The proposed change will increase the interval for surveillance tests, which are currently performed every 18 months, to a refueling cycle, nominally 24 months.

The surveillance requirements specify that each containment dome air circulator train be demonstrated operable, at least once per 18 months, by verifying that each train starts upon a Containment Cooling Actuation Signal (CCAS) and verifying that the system flow rate is equal to or greater than 37,000 cfm. These surveillances are accomplished by testing all of the Engineered Safety Features Actuation System (ESFAS) relays in an actuation sub-system (i.e., CCAS) as a total unit and by measuring the flow. The flow measurement requires access to the containment to install and monitor test instrumentation. It would be necessary to shut down the unit to perform this surveillance.

In accordance with TS 4.3.2.1 and Table 4-3.2, Note (4), semi-annual functional testing of ESF components is conducted on those components which can be operated during power operation. All of the CCAS components can be operated at power. The combination of the PPS Monthly Test and the ESF Semi-annual Functional Test completely tests the ESF actuation logic from the input to the PPS through the actuation of the tested devices. FSAR Section 7.3.1.1.1.9 describes testing of the ESFAS components. The active logic components in the ESFAS actuation path are the PPS bistables, PPS matrix relays, PPS initiation relays, ESFAS subgroup relays, ESF motor controllers, and the ESF actuated devices. The PPS Monthly Test checks the PPS bistables, matrix relays and the initiation relays. The ESF Semi-Annual Functional Test checks the ESFAS subgroup relays, motor controllers, and actuates the device.

The major difference between the combination of the two tests and the 18 month test is that the 18 month test tests all of the logic and actuated devices for a particular function all at once. The combination of the monthly testing of the PPS logic and the semi-annual testing of the subgroup relays on an individual basis provides a high level of assurance that the associated ESFAS and the ECCS components are operational.

All of the system flow measurements that have been conducted on Units 2 & 3 since the commencement of commercial operation have been satisfactory.

SONGS Units 2 and 3 have recently entered their nominal 24 month fuel cycle. A plant shutdown is required to perform portions of these surveillance. The current 18 month surveillance interval could necessitate a plant shutdown solely for the purpose of performing the 18 month surveillances. To avoid the need for an otherwise unnecessary shutdown, the proposed change would increase the surveillance test interval from 18 months to "refueling interval."

Since the proposed changes would increase the surveillance interval from 18 months to "refueling interval" for a nominal 24 month cycle, the actual time interval between surveillances will be a function of the plant capacity factor for that particular fuel cycle. The equilibrium fuel cycle length will be approximately 513 effective full power days (EFPD). Assuming a production factor of 90% and a 75 day refueling outage, the actual cycle length, and surveillance interval would be approximately 21 months. Currently, Specification 4.0.2 allows 25% extension of surveillance intervals which would accommodate 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.

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 required semi-annual testing of the components included within the scope of these technical specifications provides a high level of assurance that the equipment is capable of proper operation. The frequency of the semi-annual testing is not affected by this change. Results of surveillance testing to date have demonstrated reliable equipment performance. Increasing the interval from 18 months to once each refueling 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 proposed change only affects the frequency of refueling interval testing and does not alter the configuration of the facility or its operation. Therefore, this 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 only affects the frequency of testing on a sub-system basis (18 months) without affecting the testing frequency that is done on a sub-group basis (semi-annual). The semi-annual test is capable of detecting problems which are most likely to occur. This, coupled with reliable equipment performance and the history of satisfactory surveillance test results, makes any potential reduction in safety margin negligible. Therefore, the proposed change will not result in a significant reduction 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.

NPF-10/15-259

ATTACHMENT A
(Existing Specification)

CONTAINMENT SYSTEMS

CONTAINMENT DOME AIR CIRCULATORS

LIMITING CONDITION FOR OPERATION

3.6.4.3 Two independent dome air circulator trains shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTION:

With one dome air circulator train inoperable, restore the inoperable train to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours.

SURVEILLANCE REQUIREMENTS

4.6.4.3 Each dome air circulator train shall be demonstrated OPERABLE:

- a. At least once per 18 months by starting each train on a CCAS signal and verifying that the system operates for at least 15 minutes.
- b. At least once per 18 months by verifying a system flow rate of at least 37,000 cfm.