UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. for a Class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 2 of the San Onofre Nuclear Generating Station	)	Docket No. 50-361 Amendment Application No. 61

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 61.

This amendment application consists of Proposed Technical Specification Change No. NPF-10-265 to Facility Operating License No. NPF-10. Proposed Technical Specification Change No. NPF-10-265 is a request to revise Technical Specification 3/4.5.1, "Safety Injection Tanks." 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: Kenneth P Burke

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

OFFICIAL SEAL
C. SALLY SEBO
Notary Public-California
LOS ANGELES COUNTY
My Comm. Exp. Apr. 20, 1990

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Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. for a Class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 3 of the San Onofre Nuclear Generating Station	)	Docket No. 50-362 Amendment Application No. 47

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 47.

This amendment application consists of Proposed Technical Specification Change No. NPF-15-265 to Facility Operating License No. NPF-15. Proposed Technical Specification Change No. NPF-15-265 is a request to revise Technical Specification 3/4.5.1, "Safety Injection Tanks." 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: Kenneth P Bashi

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

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By:

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-10/15-265

This is a request to revise Technical Specification 3/4.5.1, "Safety Injection Tanks."

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 Surveillance Requirement 4.5.1.e of Technical Specification (TS) 3/4.5.1, "Safety Injection Tanks," to increase the interval for surveillance tests which are currently performed every 18 months, to each refueling, nominally 24 months. The purpose of this specification is to ensure that the safety injection tanks are operable. Surveillance Requirement 4.5.1.e specifies, at least once every 18 months, verifying that each safety injection tank isolation valve opens automatically under: 1) RCS pressure in excess of 715 psia; and 2) upon a SIAS signal. This surveillance involves entry into containment to verify the valve operation.

During normal power operations the Safety Injection Tank Isolation Valve is open with the power locked off. Due to the nitrogen pre-loading on the tank contents, immediate injection occurs upon rapid loss of pressure in the reactor coolant system (RCS), without waiting for a valve to open. When operations require depressurizing the RCS, the safety injection tank isolation valves are closed to prevent injection. If the valves are closed when a Safety Injection Actuation Signal (SIAS) is received, the valves will open.

A review of the history of the required 18 month surveillance tests, from the start of commercial operation to the present, was performed. The 18 month surveillances at San Onofre Unit 2 were all satisfactory. During December, 1983, one valve was observed to have boric acid crystals on the stem. This precluded remote operation of the valve, however, hand operation freed the valve. Minor design changes to the valve packing arrangement were made to prevent recurrence of this problem. In addition, implementation of the recommendations provided in IE Bulletin 85-03 established specific torque settings for each group of motor operated valves. These two changes, in conjunction with improved preventive maintenance, appear to have resolved this type of problem.

The surveillances at San Onofre Unit 3 were all satisfactory. During one preventive maintenance, a cracked motor operator rotor was noted. This problem would not have caused a failed surveillance.

San Onofre Units 2 and 3 have both recently entered their first nominal 24 month fuel cycle. In order to maintain radiation exposures as low as reasonably achievable, and not enter a technical specification action statement, the unit would need to be in a shutdown mode to conduct the testing. The current 18 month surveillance interval could necessitate plant shutdown solely for performing surveillance requirements. To avoid an otherwise unnecessary shutdown, the proposed change would increase the surveillance test interval from 18 months to "refueling interval."

Since the proposed change 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, TS 4.0.2 allows a 25% extension of surveillance intervals which would accommodate uninterrupted operation for the equilibrium cycle length, except that the TS 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 safety injection tank isolation valves are used to separate the RCS from the safety injection tanks when depressurizing the RCS. The proposed change increases the interval for surveillance testing currently performed at 18 month intervals to a refueling interval, nominally 24 months. There have been no failures in the 18 month surveillance program. Therefore, the proposed change will not significantly increase the probability of previously analyzed accidents.

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 affects only the frequency of the safety injection tank isolation valve surveillance. The proposed change does not alter the configuration of the facility or its operation. Therefore, the proposed change does not create the possibility of a new or different kind of accident.

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 affects only the frequency of the surveillance test which may result in a small reduction in confidence in system operability and the associated margin of safety. However, the 18 month surveillances have detected no failures. 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.

ATTACHMENT A

(Existing Specification)