

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. 60
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 60.

This amendment application consists of Proposed Technical Specification Change No. NPF-10-264 to Facility Operating License No. NPF-10. Proposed Technical Specification Change No. NPF-10-264 is a request to revise Technical Specification 3/4.4.5.2, "Operational Leakage." 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

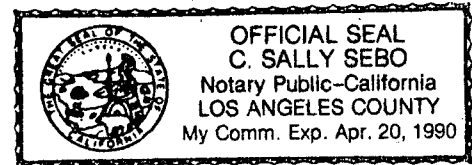
By:

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

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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. 46
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 46.

This amendment application consists of Proposed Technical Specification Change No. NPF-15-264 to Facility Operating License No. NPF-15. Proposed Technical Specification Change No. NPF-15-264 is a request to revise Technical Specification 3/4.4.5.2, "Operational Leakage." 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

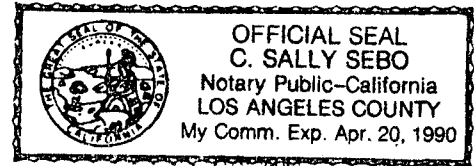
By:

Wm. P. 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



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Attorneys for Southern
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DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-10/15-264

This is a request to revise Technical Specification 3/4.4.5.2, "Operational Leakage."

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

Specifically, the proposed change would revise Surveillance Requirement (SR) 4.4.5.2.2.a of Technical Specification (TS) 3/4.4.5.2, "Operational Leakage," 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 provide limits on operational leakage. The surveillance requirements for the Reactor Coolant System (RCS) Pressure Isolation Valves provide added assurance of valve integrity thereby reducing the probability of gross valve failure and consequent intersystem LOCA. Leakage from the RCS Pressure Isolation Valves is identified leakage and will be considered as a portion of the allowable limit. The RCS Pressure Isolation Valves function to create a pressure boundary isolating the RCS from connecting systems. Surveillance Requirement 4.4.5.2.2.a requires at least once every 18 months, verification of valve leakage to be within its limit. This involves entry into containment for installation of test equipment and instrumentation.

SONGS Units 2 and 3 have 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 associated with this surveillance. 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 will be approximately 513 effective full power days. 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 a 25% extension of surveillance intervals, which would accommodate uninterrupted operation for the equilibrium cycle length, except that the TS 4.0.21 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 present technical specification requirements.

A review of the history of the required 18 month surveillance tests, from the start of commercial operation to present, was performed. The surveillances at Unit 2 were all satisfactory. During containment walkdowns, preventive maintenance, or other surveillances, boric acid crystals were noted on the piping (evidence of external leakages). The amount discovered was not enough to fail a leak rate surveillance (less than 1 gpm). These were resolved by minor maintenance, for example, by adjusting the cap bolt torquing. One instance of a cracked motor operator rotor occurred. This problem did not cause a failed surveillance.

The surveillances at Unit 3 were all satisfactory, except one failed leak rate test on four valves. The motor operator torque settings were readjusted to allow the valves to seat properly. Since this incident, IE Bulletin 85-03 was issued concerning improper torque settings. In response to this bulletin SCE evaluated actual torque requirements on each type of valve and set limits which are specific to each valve. In addition, three other valves have been repaired for minor seat leakage discovered during other TS surveillances.

Two other technical specification surveillance requirements monitor leakage from the RCS. A water balance inventory is performed every 72 hours in modes 1,2,3 and 4, as required by SR 4.5.2.1.c. In addition, a leak rate test prior to entry into mode 2 and following valve maintenance or valve actuation is performed. These surveillances provide a high level of assurance that the valves included in TS 3/4.4.5.2.2 are maintaining the RCS pressure boundary.

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 function of the RCS Pressure Isolation Valves is to create a pressure boundary between the RCS and connected systems. The proposed change increases the interval for surveillance testing currently performed at 18 month intervals to a refueling interval, nominally 24 months. There has been one failed leak test detected in the 18 month surveillance program, which is not expected to be repeated due to the implementation of the recommendations provided in IE Bulletin 85-03. 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 RCS Pressure Isolation Valves 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 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 only detected one failure, which has been resolved in conjunction with IE Bulletin 85-03. In addition, other technical specification surveillances establish requirements to monitor leakage from the reactor coolant system on a more frequent basis. 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-10/15-264

ATTACHMENT A
(Existing Specifications)