

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. 51
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 51.

This amendment application consists of Proposed Technical Specification Change No. NPF-10-256 to Facility Operating License No. NPF-10. Proposed Technical Specification Change No. NPF-10-256 is a request to revise Technical Specification 3/4.3.1, "Reactor Protective Instrumentation," and Technical Specification 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation." 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
PDC

Subscribed on this 7th day of November, 1988.

Respectfully submitted,

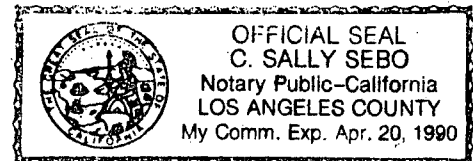
SOUTHERN CALIFORNIA EDISON COMPANY

By: Wm. P. Beoletto

Subscribed and sworn to before me this
7th day of November, 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. 37
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 37.

This amendment application consists of Proposed Technical Specification Change No. NPF-15-256 to Facility Operating License No. NPF-15. Proposed Technical Specification Change No. NPF-15-256 is a request to revise Technical Specification 3/4.3.1, "Reactor Protective Instrumentation," and Technical Specification 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation." 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 7th day of November, 1988.

Respectfully submitted,

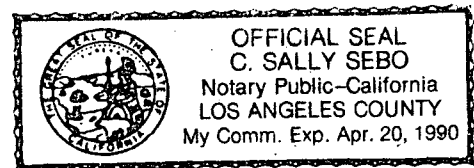
SOUTHERN CALIFORNIA EDISON COMPANY

By: *Denneth P. Brubaker*

Subscribed and sworn to before me this
7th day of November, 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 CHANGE NPF-10/15-256

This is a request to revise Technical Specification (TS) 3/4.3.1, "Reactor Protective Instrumentation," and TS 3/4.3.2, "Engineered Safety Features Actuation System 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 (TS) 3/4.3.1, "Reactor Protective Instrumentation," and TS 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation" to increase the interval for surveillance tests, which are currently performed every 18 months, to each refueling, nominally 24 months. TS 3/4.3.1 defines the number of channels of instrumentation required to be operable for each reactor trip functional unit, periodic surveillance tests to verify operability, and action to be taken if the minimum operability requirements are not met. The testing required by TS 3/4.3.1 assures that the various functional units of the reactor protective instrumentation will detect abnormal conditions and initiate a reactor trip to mitigate the consequences of transients and accidents, consistent with the assumptions of the safety analyses. TS 3/4.3.2 defines the Engineered Safety Features Actuation System (ESFAS) instrumentation channels and bypasses required to be operable, periodic surveillance tests to verify operability, and action to be taken if the minimum operability requirements are not met. The operability of the reactor protective and ESFAS instrumentation and bypasses ensures that: 1) associated ESFAS action and/or reactor trip will be initiated when the parameter monitored by each channel or combination thereof reaches its setpoint, 2) the specified coincidence logic is maintained, 3) sufficient redundancy is maintained to permit a channel to be out of service for testing or maintenance, and 4) sufficient system functional capability is available from diverse parameters.

One of the functional units covered by TS 3/4.3.1 is the Plant Protection System (PPS). The PPS provides automatic response to anticipated operation occurrences and postulated accidents by continuously monitoring various process parameters, and initiating protective action if any parameter exceeds the setpoint values.

All PPS monitored parameters are associated with the Reactor Protective System (RPS) and/or the ESFAS. The RPS protects the reactor core and Reactor Coolant System by initiating a reactor shutdown if measured parameters exceed the setpoint values. The ESFAS is designed for accident response. If an ESFAS parameter exceeds the allowable setpoint value, one or more ESFAS functions actuate responses intended to limit equipment damage and to mitigate the consequences of postulated accidents. Each parameter is monitored on four independent, isolated channels, designated "A" through "D." The same parameter must signal an unsafe condition on any two of these four channels before the PPS initiates protective action.

The PPS has bypass circuits that disable system trips for purpose of start-up, shutdown, or testing and maintenance. Bypasses are catalogued as either PPS trip channel bypasses or operational bypasses. PPS trip channel bypass logic allows manual bypass of one (and only one) channel, at any given time. Operational bypasses are either automatic, manual, or a combination thereof, and may involve bypass of the selected parameter(s) on more than one channel. Two of the surveillance requirements, 4.3.1.2 (for RPS instrumentation) and 4.3.2.2 (for ESFAS instrumentation), require that the total bypass function be demonstrated operable at least once per 18 months during channel calibration testing of each channel affected by bypass operation.

The SONGS Units 2 and 3 refueling surveillance test requires a trip condition on all four PPS channels for testing of the Steam Generator Low Flow (S/G LF) Bypass Logic. This requires the unit to be in one of the shutdown modes in order to conduct the 18 month surveillance test. All other trip and operational bypasses are tested at power during the monthly PPS surveillance testing on one channel at a time. Except for the S/G LF Bypass, the monthly tests are the same as the 18 month surveillance test. The monthly PPS surveillance test checks the S/G LF Bypass on a single channel basis. Monthly testing of these bypasses provides a high level of assurance that the system is operating properly.

All PPS bypasses are annunciated on the main control board. Operating procedures require control room personnel to check for proper bypass operation during plant evolutions. Most failures of a bypass to operate properly would be indicated on the main control board annunciator and would be readily detected by the operator.

SONGS Units 2 and 3 have both entered their first nominal 24 month fuel cycle. A plant shutdown is required to perform portions of these surveillances. 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 would increase the surveillance test interval from 18 months to "once each refueling."

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 a 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 monthly testing of the PPS bypass logic provides a high level of assurance that the PPS bypasses are functioning properly. The frequency of this monthly PPS testing is not affected by this change. 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 surveillance 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 the testing which is currently performed at 18 month intervals. Other testing conducted on a more frequent basis provides a high level of assurance that the PPS bypass logic is functioning properly. Therefore, the proposed change will not involve 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-10/15-256

ATTACHMENT A
(Existing Specifications)