

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. 74
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 74.

This amendment application consists of Proposed Technical Specification Change No. NPF-10-282 to Facility Operating License No. NPF-10. Proposed Technical Specification Change No. NPF-10-282 is a request to revise Technical Specification 3/4.1.3.3, "Position Indicator Channel-Shutdown." 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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Subscribed on this 19th day of December, 1988.

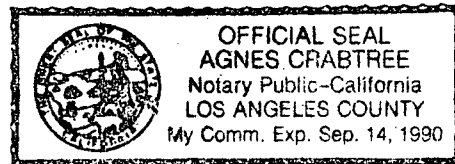
Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Wm. P. Bush

Subscribed and sworn to before me this
19th day of December 1988.

Agnes Crabtree
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. 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-15-282 to Facility Operating License No. NPF-15. Proposed Technical Specification Change No. NPF-15-282 is a request to revise Technical Specification 3/4.1.3.3, "Position Indicator Channel-Shutdown." 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 19th day of December, 1988.

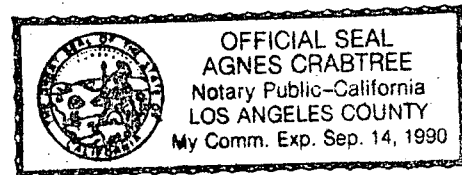
Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Wm. P. Bush

Subscribed and sworn to before me this
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Agnes Crabtree
Notary Public in and for the County of
Los Angeles, State of California



Charles R. Kocher
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Attorneys for Southern
California Edison Company

By: James A. Beoletto

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-10/15-282

This is a request to revise Technical Specification 3/4.1.3.3, "Position Indicator Channel-Shutdown."

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) 3/4.1.3.3, "Position Indicator Channel-Shutdown" to increase the interval for surveillance tests, which are currently performed every 18 months, at each refueling in Modes 3, 4 or 5, to a "refueling interval," nominally 24 months. Technical specification 3/4.1.1.3 requires each of the Control Element Assembly (CEA) Reed Switch Position Transmitter (RSPT) indicator channels be determined operable by performing a Channel Functional Test. The RSPTs are used to detect CEA positions and provide input to both the Core Protection Calculators (CPCs) (25% for each CPC) and CEACs. Each of the 91 CEAs is monitored by two RSPTs and by the Plant Monitoring System through a diverse position monitoring system. Any change in the calibration of a single RSPT is easily detected by comparison of these three indications of CEA position. The overwhelming majority of plant operation is conducted in an all rods out configuration. This surveillance provides assurance that the CPC/CEACs actually respond to rod motion by testing the RSPTs response over the entire range of possible rod positions from full-in to full out. If the unit were shutdown or tripped during the fuel cycle and the surveillance requirement had not been completed within the required time frame, this surveillance would have to be conducted prior to restart.

A review of the history of the required 18 month surveillance tests conducted from commercial operation to the present was performed and no adverse failure trends were observed. In addition, the CPC/CEACs are self-checking digital computers which are subject to monthly surveillance tests and detailed channel checks on a shift basis. The extension of the refueling interval functional tests for the RSPTs has no impact on plant safety because these detailed checks will identify any channel problem before it can impact the conservative operation of the CPC/CEAC.

SONGS Unit 2 and Unit 3 have both entered their first nominal 24 month fuel cycle. A plant shutdown is required to perform these surveillances. The current 18 month surveillance interval could require additional outage time, in the event of a plant shutdown solely for the purpose of performing 18 month surveillance requirements. To avoid the need for an extension of an unplanned outage, the proposed change would increase the surveillance test interval from 18 months to "once per 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 the 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

This change only extends testing that is performed every 18 months to each refueling (nominally 24 months). Other surveillance testing performed on a more frequent basis provides a high level of assurance that the equipment is functioning properly. Self-checking features of the CPCs and CEACs add to that assurance. Channel checks that are performed each shift provide validation that the process inputs to the CEACs and CPCs are reasonable. Therefore, the proposed change will not involve a significant increase in the probability or consequences of any 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

This proposed change only affects the frequency of certain surveillance testing and does not involve a design change. 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

This change only extends testing that is performed every 18 months to each refueling (nominally 24 months). Other surveillance testing performed on a more frequent basis provides a high level of assurance that the equipment is functioning properly. Self-checking features of the CPCs and CEACs add to that assurance. Channel checks that are performed each shift provide validation that the process inputs to the CEACs and CPCs are reasonable. The existing margin of safety will be maintained over the slightly extended surveillance interval. 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-10/15-282

ATTACHMENT "A"
(Existing Specifications)

REACTIVITY CONTROL SYSTEMS

POSITION INDICATOR CHANNEL - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.1.3.3 At least one CEA Reed Switch Position Transmitter indicator channel shall be OPERABLE for each shutdown, regulating or part length CEA not fully inserted.

APPLICABILITY: MODES 3*, 4* and 5*.

ACTION:

With less than the above required position indicator channel(s) OPERABLE, immediately open the reactor trip breakers.

SURVEILLANCE REQUIREMENTS

4.1.3.3 Each of the above required CEA Reed Switch Position Transmitter indicator channel(s) shall be determined to be OPERABLE by performance of a CHANNEL FUNCTIONAL TEST at least once per 18 months.

* With the reactor trip breakers in the closed position.