

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. 99
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 99.

This amendment application consists of Proposed Technical Specification Change NPF-10-342 to Facility Operating License No. NPF-10. Proposed change No. NPF-10-342 is a request to revise Technical Specification (TS) 3/4.7.1.1, "Safety Valves," Table 3.7-1, "Steam Line Safety Valves per Loop," Table 3.7-2, "Maximum Allowable Linear Power Level-High Trip Setpoint With Inoperable Steam Line Safety Valves During Operation With Both Steam Generators," and the corresponding Bases section.

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Subscribed on this 7th day of November, 1990.

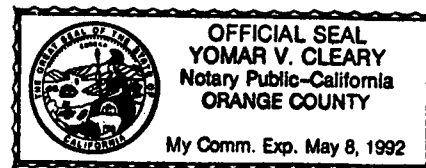
Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Harold B. Ray

Subscribed and sworn to before me this
7 day of November 1990.

Yomar V. Cleary
Notary Public in and for the County of
Orange, State of California



James A. Beoletto
Attorney for Southern
California Edison Company

By: James A. Beoletto
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. 84
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 84.

This amendment application consists of Proposed Technical Specification Change NPF-15-342 to Facility Operating License No. NPF-15. Proposed change No. NPF-15-342 is a request to revise Technical Specification (TS) 3/4.7.1.1, "Safety Valves," Table 3.7-1, "Steam Line Safety Valves per Loop," Table 3.7-2, "Maximum Allowable Linear Power Level-High Trip Setpoint With Inoperable Steam Line Safety Valves During Operation With Both Steam Generators," and the corresponding Bases section.

Subscribed on this 4th day of November, 1990.

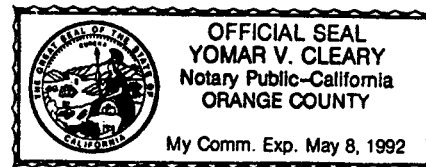
Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Donald B. Bay

Subscribed and sworn to before me this
7 day of November 1990.

Yomar V. Cleary
Notary Public in and for the County of
Orange, State of California



James A. Beoletto
Attorney for Southern
California Edison Company

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James A. Beoletto

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGE NPF-10/15-342

This is a request to revise Technical Specification 3/4.7.1.1, "Safety Valves," Table 3.7-1, "Steam Line Safety Valves per Loop," Table 3.7-2, "Maximum Allowable Linear Power Level-High Trip Setpoint With Inoperable Steam Line Safety Valves During Operation With Both Steam Generators," and the corresponding Bases section.

Existing Specifications

Attachment A
Attachment C

Proposed Specifications

Attachment B
Attachment D

Description

The Main Steam Safety Valves (MSSVs) protect the main steam lines from overpressure transients. When one or more MSSVs are inoperable, Technical Specification (TS) Table 3.7-2 requires a reduction in the Maximum Allowable Linear Power Level-High Trip Setpoint. Due to a change in the allowable value for this setpoint in Table 2.2-1, "Reactor Instrumentation Trip Setpoints Limits," the values in Table 3.7-2 must be revised. In addition, revisions to the Bases of TS 3/4.7.1.1 are requested. The proposed changes to the MSSV Bases will delete ambiguity, clarify the design requirements, and correct both typographical and numerical errors. Changes to TS 3/4.7.1.1, "Safety Valves," and Table 3.7-1, "Steam Line Safety Valves per Loop," are editorial revisions needed to remain consistent with the proposed Bases.

Discussion

On June 8, 1990, NRC approved Amendments Nos. 88 and 78 for Units 2 and 3, respectively. These amendments revised the Allowable Value of the Linear Power Level-High Trip Table 2.2-1, "Reactor Instrumentation Trip Setpoints Limits." The allowable value was reduced from 111.3% Rated Thermal Power (RTP) to 111.0% RTP. This revision was made to account for both an increase in the allowed tolerance for trip bistable functional testing and a decrease in the daily secondary calorimetric calibration tolerance to maintain the operating margin. When the amendment request (PCN-275) was made, it was not recognized that this change also affected the values in Table 3.7-2, "Maximum Allowable Linear Power Level-High Trip Setpoint With Inoperable Steam Line Safety Valves During Operation With Both Steam Generators."

The reduced reactor trip allowable values for inoperable main steam safety valves (MSSVs) are calculated using an equation in the Bases to TS 3/4.7.1.1, "Safety Valves." The equation uses the Linear Power Level-High allowable value directly. The reduction in the allowable value decreased the values in Table 3.7-2 by a small amount. Although the current values in Table 3.7-2 were not revised with PCN-275, there has been no significant safety impact. The proposed changes to Table 3.7-2 do not impact the overpressure protection safety analyses.

The proposed changes to the values in Table 3.7-2 do not change the MSSV overpressure protection analyses. The analyses assumes that the reactor trip occurs on High Pressurizer Pressure in all cases and not on Linear Power Level-High. Thus, the Linear Power Level-High trip is not credited in the overpressure protection analyses. The function of the reduced reactor trip allowable values of Table 3.7-2 is to enforce a reduction in core operating power level when MSSVs are inoperable. When MSSVs are inoperable, power is reduced administratively to a conservative level below the pre-trip alarm setpoint. This reduced power level bounds the proposed reductions to the values in Table 3.7-2. In addition, administrative controls are in place to ensure that the reduced reactor trip values are set correctly when MSSVs are inoperable.

Separate from the changes to Table 3.7-2, the MSSV Bases revisions clarify the safety valve's design requirements. Specifically, the design requirement is to limit secondary system pressure to less than 1210 psia during anticipated operational transients. Changes to the Limiting Condition for Operation (LCO) and Action statements of TS 3/4.7.1.1 and to Table 3.7-1, "Steam Line Safety Valves per Loop," are editorial revisions needed to remain consistent with the proposed Bases.

Safety Analysis:

The proposed change described above shall be deemed to involve a significant hazards consideration if there is a positive finding in any 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 proposed change to Table 3.7-2, "Maximum Allowable Linear Power Level-High Trip Setpoint With Inoperable Steam Line Safety Valves During Operation With Both Steam Generators," slightly decreases the current reduced allowable values. The proposed change reflects a recent amendment to the Allowable Value of the Linear Power Level-High Trip in Table 2.2-1, "Reactor Instrumentation Trip Setpoints Limits." The proposed Bases changes are editorial in nature and do not alter any accident analyses assumptions. The proposed changes to the LCO and Action statements of TS 3/4.7.1.1, "Safety Valves," and to Table 3.7-1,

"Steam Line Safety Valves per Loop," are also editorial revisions required for consistency with the proposed Bases. Therefore, operation of the facility in accordance with this proposed change does not constitute an 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 will slightly reduce the allowable values in Table 3.7-2. The change does not involve any plant modifications or a change in plant operation. The proposed changes to TS 3/4.7.1.1, Table 3.7-1, and the Bases are editorial in nature and do not entail a plant modification or a change in plant operation. Therefore, the proposed change does 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 this proposed change involve a significant reduction in a margin of safety?

RESPONSE: No.

The proposed change corrects the values of Table 3.7-2. These corrections further decrease the reduced allowable values when main steam safety valves are inoperable. The proposed changes to TS 3/4.7.1.1, Table 3.7-1, and the Bases are editorial in nature, and do not affect the plant's margin of safety. Therefore, the proposed change does not involve any reduction in a margin of safety.

SAFETY AND SIGNIFICANT HAZARDS CONSIDERATION 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; (2) there is a 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.