

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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| 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. 100 |
| Generating Station |) | |

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 100.

This amendment application consists of Proposed Technical Specification Change No. NPF-10-303 to Facility Operating License No. NPF-10. Proposed Technical Specification Change No. NPF-10-303 is a request to revise San Onofre Unit 2 Technical Specification 3/4.7.2 to clarify that the pressure/temperature limitation applies only to the steam generator secondary side. In addition, the basis are revised to include a change to the reference temperature for the nil ductility transition.

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Subscribed on this 14th day of November, 1990.

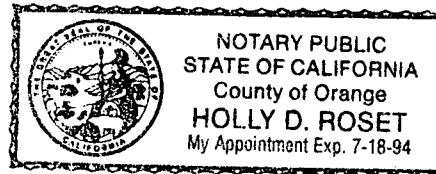
Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Harold B. Ray
Harold B. Ray
Senior Vice President

Subscribed and sworn to before me this
14th day of November.

Holly D. Roset
Notary Public in and for
the 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. 85 |
| Generating Station |) | |

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 85.

This amendment application consists of Proposed Technical Specification Change No. NPF-15-303 to Facility Operating License No. NPF-15. Proposed Technical Specification Change No. NPF-15-303 is a request to modify the minimum pressurization temperature for the San Onofre Unit 3 steam generators from 70°F to 90°F based on a vendor recommendation concerning a change to the reference nil ductility transition. The corresponding basis is also revised. Additionally, the Technical Specification is clarified to indicate that the pressure/temperature limitation pertains only to the steam generator secondary side.



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Subscribed on this 14th day of November, 1990.

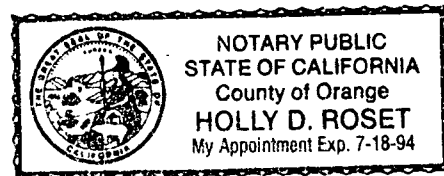
Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Harold B. Ray
Harold B. Ray
Senior Vice President

Subscribed and sworn to before me this
14th day of October November.

Holly D. Roset
Notary Public in and for
the State of California



James A. Beoletto
Attorney for Southern
California Edison Company

By: James A. Beoletto
James A. Beoletto

DESCRIPTION OF PROPOSED CHANGE NPF-10-303 AND
NPF-15-303 AND SAFETY ANALYSIS

This is a request to revise Section 3/4.7.2, "Steam Generator Pressure/Temperature Limitation" of the Technical Specifications for San Onofre Nuclear Generating Station, Units 2 and 3.

Description

The proposed change revises Technical Specification Section 3/4.7.2, "Steam Generator Pressure/Temperature Limitation". Specifically, the proposed change increases the minimum pressurization temperature for unit 3 (unit 2 is not changed), corrects the RT_{NDT} specified in the Basis for Technical Specification 3/4.7.2 and notes that the limit applies only to the secondary side of the steam generator.

Existing Technical Specifications

Unit 2: See Attachment A
Unit 3: See Attachment B

Proposed Technical Specifications

Unit 2: See Attachment C
Unit 3: See Attachment D

Technical Specification 3/4.7.2 specifies requirements which ensure that the steam generator pressure/temperature is maintained within the limits of the ASME Boiler and Pressure Vessel Code. Section 3/4.7.2 currently specifies a primary/secondary side minimum pressurization temperature of 70°F based on a reference temperature for the nil ductility transition of 30°F. The reference temperature for the nil ductility transition (RT_{NDT}) specified in the Basis for Technical Specification 3/4.7.2 has been corrected from 30°F for each steam generator in each unit to 60°F for the Unit 3 steam generators and 40°F for the Unit 2 steam generators. The revised RT_{NDT} values are based on an evaluation of the limiting secondary side material properties used in the fabrication of the steam generators for each unit. Licensee Event Report (LER) 90-009 provides a chronology of the events leading to discovery of this discrepancy. The pressurization temperature limitations specified in Section 3/4.7.2 have been revised accordingly using the guidelines specified in the 1974 Edition of the ASME Boiler and Pressure Vessel Code, Section III, Division 1, Subsection NC 2332 D ($RT_{NDT} + 30^\circ\text{F}$). The minimum pressurization temperature when steam generator pressure is greater than or equal to 200 psig is then 70°F (as currently specified) for Unit 2 and 90°F for Unit 3.

The pressure/temperature limitation for the primary system is governed by Section 3/4.4.8. Section 3/4.7.2 has therefore been revised to pertain specifically to the secondary side of the steam generator.

Safety Analysis

The proposed change 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 proposed change prescribes a more restrictive steam generator temperature limitation for Unit 3; specifies Section 3/4.7.2 as applying specifically to the secondary side of the steam generator and specifies RT_{NDT} values consistent with the respective material properties of the Units 2 and 3 steam generators. The more restrictive steam generator temperature limitation provides the required 30°F margin between the RT_{NDT} and the lowest service temperature as specified by the 1974 Edition of the ASME Boiler and Pressure Vessel Code. The application of this limitation only to the secondary side is merely a clarification since Technical Specification 3/4.4.8 provides the appropriate limitation for the primary side. The proposed change is consistent with the applicable design criteria and therefore does not involve any increase in the probability or consequences of an accident previously evaluated.

2. Will operation of the facility in accordance with the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change does not involve a change in the plant configuration. Further, the proposed change facilitates plant operation consistent with the applicable design criteria and existing Technical Specifications. The 1974 Edition of the ASME Boiler and Pressure Vessel Code prescribed a 30°F margin between the RT_{NDT} and minimum steam generator temperature at pressures greater than 20% of the preoperational hydrostatic test pressure. The change prescribes a more restrictive steam generator temperature limitation for Unit 3; clarifies that Section 3/4.7.2 applies only to the secondary side of the steam generator and provides RT_{NDT} values consistent with the respective material properties of the Units 2 and 3 steam generators as provided by the vendor. The application of this limitation only to the secondary side is merely a clarification since Technical Specification 3/4.4.8 provides the appropriate limitation for the primary side. The proposed change is consistent with the applicable design criteria and therefore, no accidents of a different nature or type will occur as a result of operation at the new more conservative limitation.

3. Will operation of the facility in accordance with the proposed change involve a significant reduction in margin of safety?

Response: No

The proposed change substantiates the margin of safety established in the applicable design criteria. Technical Specification 3/4.7.2 specifies requirements which ensure that the steam generator pressure/temperature is maintained within the limits of the ASME Boiler and Pressure Vessel Code. The code specifies that the lowest service temperature is the nil ductility reference temperature (RT_{NDT}) + 30°F. The reference temperature for the nil ductility transition (RT_{NDT}) specified in the Basis for Technical Specification 3/4.7.2 has been corrected by the vendor from 30°F for each steam generator in each unit to 60°F for the Unit 3 steam generators and 40°F for the Unit 2 steam generators. The revised RT_{NDT} values are based on an evaluation of the limiting secondary side material properties used in the fabrication of the steam generators for each unit. The minimum pressurization temperature when steam generator pressure is greater than or equal to 200 psig is thus 70°F (as currently specified) for Unit 2 and 90°F for Unit 3. The higher temperature proposed for Unit 3 therefore does not involve a reduction in the margin of safety.

Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not involve a significant hazards consideration as defined by 10 CFR 50.92; (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.