

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. 104
Generating Station	)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 104.

This amendment application consists of Proposed Technical Specification Change No. NPF-10-351 to Facility Operating License NPF-10. Proposed Technical Specification Change No. NPF-10-351 is a request to revise Technical Specification 3/4.6.1.2, "Containment Leakage." The Proposed Change would revise Surveillance Requirement 4.6.1.2.a to permit the third Type A Test of each 10-year inservice interval to be conducted during a separate plant outage from the 10-year plant Inservice Inspection.

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PDR ADOCK 05000361  
PDR

Subscribed on this 8th day of April, 1991.

Respectfully Submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

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

Subscribed and sworn to before me this  
8th day of April, 1991.

Mariane Sanchez  
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. 89
Generating Station	)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 89.

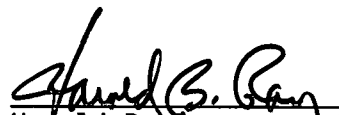
This amendment application consists of Proposed Technical Specification Change No. NPF-15-351 to Facility Operating License NPF-15. Proposed Technical Specification Change No. NPF-15-351 is a request to revise Technical Specification 3/4.6.1.2, "Containment Leakage." The Proposed Change would revise Surveillance Requirement 4.6.1.2.a to permit the third Type A Test of each 10-year inservice interval to be conducted during a separate plant outage from the 10-year plant Inservice Inspection.

Subscribed on this 8th day of April, 1991.

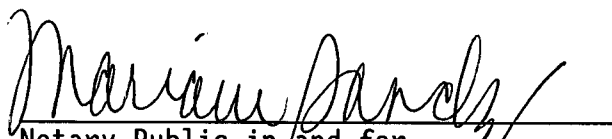
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Senior Vice President


Subscribed and sworn to before me this  
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Notary Public in and for  
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James A. Beoletto  
Attorney for Southern  
California Edison Company

By:

  
James A. Beoletto

Enclosure I

REQUEST FOR EXEMPTION  
10 CFR 50, APPENDIX J, SECTION III.D.1(a)  
"PERIODIC RETEST SCHEDULE"  
FOR  
SAN ONOFRE NUCLEAR GENERATING STATION UNITS 2 AND 3

## 1.0 INTRODUCTION

### 1.1 PURPOSE

This submittal provides information in support of a request for an exemption pursuant to Title 10 of the Code of Federal Regulations Part 50.12, "Specific Exemptions," from a requirement of 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," for San Onofre Nuclear Generating Station, Units 2 and 3. Specifically, an exemption is requested to the requirements of 10 CFR 50, Appendix J, Section III.D.1(a), "Periodic Retest Schedule."

### 1.2 BACKGROUND

#### 1.2.1 10 CFR 50, APPENDIX J, SECTION III.D.1(a) REQUIREMENTS

10 CFR 50, Appendix J establishes specific acceptance criteria for preoperational testing and periodic verification by tests of the leak-tight integrity of the primary reactor containment. The purpose of the Appendix J tests are to ensure that:

- (a) leakage through the primary reactor containment and systems and components penetrating primary containment shall not exceed allowable leakage rate values as specified in the technical specifications or associated bases,

(Type A Test)

- (b) periodic surveillance of reactor containment penetrations and isolation valves is performed so that proper maintenance and repairs are made during the service life of the containment, and systems and components penetrating primary containment.

(Type B and C Tests)

The Type A tests in part, satisfy the requirements of 10 CFR 50, Appendix J. 10 CFR 50, Appendix J, Section III.D.1(a) requires a set of three Type A Containment overall integrated leakage rate tests (ILRTs) to be performed at approximately equal intervals during each 10-year service period. It further requires that the third test of each set be conducted when the plant is shutdown for the 10-year plant Inservice Inspection (ISI). The requirement to perform the ISI is governed by 10 CFR 50.55a, "Codes and Standards."

### 1.2.2

#### CRITERIA FOR EXEMPTIONS - 10 CFR 50.12 REQUIREMENTS

The NRC has established certain criteria which permit Licensees to request specific exemptions to its rules and regulations provided special circumstances exist. These requirements are embodied in 10 CFR 50.12, "Specific Exemptions," and in part, are as follows:

- (a) The Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of the regulations of this part, which are--
  - (1) Authorized by the law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security.
  - (2) The Commission will not consider granting an exemption unless special circumstances are present.

Conditions that are considered special circumstances are also identified in 10 CFR 50.12. The special circumstances relevant to SCE's request are presented below:

- (ii) Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule,
- (iii) Compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted, or that are significantly in excess of those incurred by others similarly situated.

### 2.0

#### REQUEST FOR EXEMPTION

The two programs, the Containment ILRT and the 10-year ISI, are unrelated to one another and can be performed irrespective of one another. The apparent purpose for requiring the third Type A test to be performed during shutdown for the 10-year plant ISI, is to assure that the three Type A tests are not bunched together during the first 90 months of the 10-year operation cycle. This also provides further assurance that the three Type A tests are evenly spaced over the 10-year interval.

ASME Boiler & Pressure Vessel Code for mechanical systems and components establishes the 10-year inservice inspection period. The purpose of the inspection program is to ensure that structural integrity of Class 1, 2, and 3 components are maintained in accordance with the requirements of ASME Code Section XI. The 10-year Reactor Vessel ISI is a part of the entire program.

Compliance with 10 CFR 50, Appendix J, Section III.D.1(a), to perform a Type A test and the 10-year ISI during the same outage, does not appear to serve the underlying purpose of the rule. The purpose of the Appendix J test is to ensure that leakage through the primary reactor Containment, and systems and components penetrating Containment, does not exceed allowable leakage values specified in Technical Specification 3/4.6.1.2, "Containment Leakage." Conducting the third Type A test during the same outage as the shutdown for the 10-year plant ISI does not enhance the purpose, or provide further assurance of Containment integrity above that which has already been demonstrated.

The third Type A test and the 10-year ISI are currently scheduled for separate refueling outages. The third Type A test of the first 10-year service period is scheduled to be conducted during the units' upcoming Cycle 6 Refueling Outage. A complete offload of the Reactor Core will be performed to allow work activities in several plant systems. However, removal of the Core Barrel, which is a major evolution, is not planned. Approximately 12 to 15 days of critical path time would be needed to perform the Reactor Vessel ISI, including the remote visual examinations of the Core Barrel, Vessel Internals, and the Vessel ID surface.

This could only be accomplished at a considerable monetary expense and would impose a significant burden upon SCE resources to perform such an inspection. This inspection is planned to be performed during the Cycle 7 Refueling Outage, which is planned to be a long outage and also marks the last refueling outage prior to the end of the unit's first 10-year inspection interval.

To perform a fourth Type A test during the same shutdown as the 10-year plant ISI (Cycle 7 Refueling Outage) would only satisfy the technical specification requirement to perform a Type A test during the same shutdown for the 10-year plant ISI. Performance of the fourth Type A test could only be done at great monetary expense to SCE. Additionally, performing a fourth Containment ILRT, for the sole purpose of being done during the same outage as the 10-year ISI, would not necessarily enhance the purpose, or provide further assurance of Containment integrity above that which has already been demonstrated.

SONGS Units 2 and 3 Technical Specification 3/4.6.1.2 provides limits on Containment leakage rates. Surveillance Requirement 4.6.1.2 dictates that Containment leakage rates be demonstrated at particular test schedules in conformance with the criteria specified in 10 CFR 50, Appendix J. As previously discussed, Appendix J requires that the three Type A tests be performed at approximately equal intervals over each 10-year period. This requirement would continue to be preserved. Essentially, the requested exemption to the schedular requirements of 10 CFR 50, Appendix J would permit the Type A test to be performed at a separate outage from the Containment ILRT.



Therefore, pursuant to 10 CFR 50.12(a)(2)(ii), and 10 CFR 50.12(A)(2)(iii), SCE requests an exemption to the requirements of 10 CFR 50, Appendix J, Section III.D.1(a).