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SUBJECT: Forwards Amend Applications 101 & 86 to Licenses NPF-10 &
 NPF-15, respectively, revising Tech Spec 3/4.5.2 re ECCS sys
 Tavgr greater than or equal to 350 F.

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 TITLE: OR/Licensing Submittal: Loss of Residual Heat Removal (RHR) GL-87-12

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April 15, 1991

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Amendment Application Nos. 101 and 86
Change to Technical Specification 3/4.5.2
"ECCS Systems - T_{avg} Greater Than or Equal to 350°F."
Emergency Core Cooling Systems
(TAC Nos. 69774 and 69745)
San Onofre Nuclear Generating Station
Units 2 and 3

- References:
- 1) Generic Letter 88-17, "Loss of Decay Heat Removal"
 - 2) Letter from F. R. Nandy (SCE) to the NRC dated October 31, 1990, Subject: NRC Generic Letter No. 88-17, "Loss of Decay Heat Removal, Programmed Enhancements" (TAC Nos. 69774 and 69745)

Enclosed are Amendment Application Numbers 101 and 86 to Facility Operating Licenses NPF-10 and NPF-15, respectively, for the San Onofre Nuclear Generating Station Units 2 and 3. These Amendment Applications consist of Proposed Change Number 346 (PCN-346), which is a request to revise Technical Specification 3/4.5.2, "ECCS Systems - T_{avg} Greater Than or Equal to 350°F." This change would delete the surveillance requirements on the Shutdown Cooling (SDC) Auto-Closure Interlock (ACI). When this Technical Specification is approved by the NRC, Southern California Edison will remove this ACI.

Removal of the SDC system ACI addresses NRC concerns on potential spurious ACI actuations which cause inadvertent isolation of SDC during cold shutdown and refuelings. In addition, this proposed change is consistent with the recommendations of Generic Letter 88-17, "Loss of Decay Heat Removal," Reference 1. As stated in Reference 2, spurious ACI actuation contributes approximately 39 percent to SDC system unavailability. The Combustion

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Engineering Owners' Group (EOG) recommends, in their report titled "Risk Evaluation of Removal of the Shutdown Cooling System Auto Closure InterLock," removal of this ACI to further enhance plant safety during mid-loop operation. We will forward this report to you by a separate letter in approximately 3 weeks.

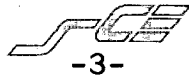
The ACI currently provides automatic closure of the SDC system suction isolation valves when pressurizer pressure is greater than or equal to 715 psia. This interlock was provided to protect the SDC system from overpressure conditions due to a plant heatup with the suction valves inadvertently left open.

An existing alarm in the control room for each SDC isolation valve will warn the operators if the reactor coolant system pressure is greater than 383 psia and any of the SDC system suction isolation valves is not fully closed. Each alarm obtains its valve position input from a source independent of the valve control functions or existing position indication circuitry. The alarm circuit is independent of the availability of control power or indicating light power to the valve. These alarms will also be initiated if the valve is not fully closed and there is a loss of power either to the instrument loop or to the alarm auxiliary relay circuit. The existing open permissive interlock, which prevents opening a SDC system suction isolation valve when pressurizer pressure is greater than 376 psia, will be maintained.

The previously performed supporting calculations for the pressure alarm setpoint and the open permissive interlock setpoint do not meet the requirements of our current setpoint calculation methodology. Therefore, we are performing new calculations in accordance with our ongoing setpoint evaluation program to support the current setting of 383 psia for the alarm and 376 psia for the open permissive interlock. We will complete these calculations within the next 90 days. If these setpoints change, we will make a separate submittal advising you of the new setpoints.

We believe the reasons for removing the ACI remain valid even if these setpoints change. The calculations we are performing will assure the alarm setpoint and open permissive interlock setpoint provide adequate protection to the SDC System. The SDC system relief valve, which is used for low temperature overpressure protection of the reactor coolant system and is set to relieve at 406 psig (421 psia) +/- 10 psi, prevents any transient pressure from exceeding the isolation valve ACI setpoint of 715 psia. The alarm and the SDC system relief valve allow for the removal of the ACI without impacting plant safety.

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The Unit 2 ACI is to be removed while the core is offloaded during the upcoming Unit 2 Cycle 6 refueling outage. Based on the current outage start date of August 3, 1991, we plan to complete the core offload by August 23, 1991 and start the core reload on September 13, 1991. Therefore, we need your concurrence with this amendment request by August 23, 1991 and formal approval by September 13, 1991.

If you need additional information on this Technical Specification change request, please let me know.

Very truly yours,

Enclosure

cc: J. B. Martin, Regional Administrator, NRC Region V
C. Caldwell, NRC Senior Resident Inspector, San Onofre
Units 1, 2 and 3