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SUBJECT: Forwards Amend Application 109 to License NPF-10 consisting
of Proposed Change Number NPF-10-355 changing Surveillance
Requirements 4.8.1.1.2.d.1 in Tech Spec 3/4.8.1, "AC
Sources, Electrical Power Sys."

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May 22, 1991

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

Gentlemen:

Subject: Docket No. 50-361
Proposed Change NPF-10-355
A. C. Sources, Electrical Power Systems
San Onofre Nuclear Generating Station
Unit 2

Enclosed is Amendment Application No. 109 to Facility Operating License NPF-10 for the San Onofre Nuclear Generating Station (SONGS), Unit 2. This application consists of Proposed Change Number NPF-10-355 (PCN-355). PCN-355 is a request to change Surveillance Requirement (SR) 4.8.1.1.2.d.1 in Technical Specification (TS) 3/4.8.1, A. C. Sources, Electrical Power Systems, to permit a surveillance interval extension of up to one month, from 24 to 25 months, on a one-time basis for Cycle 5. This surveillance subjects two separate and independent diesel generators (DG) to an inspection consistent with manufacturer's recommendations.

This one time exemption is being requested because Cycle 5 has been extended due to several unplanned major outages such as the steam generator feeding repair outage in July/August 1990 and the reactor coolant pump seal replacement outage in April/May 1991. Therefore, Southern California Edison (SCE) requests this surveillance interval extension to avoid the potential for stopping refueling activities during the Cycle 6 refueling outage. The current SR 4.8.1.1.2.d.1 surveillance interval for the A-Train DG could expire before SR 4.8.1.1.2.d.1 for B-Train DG can be completed. Both DGs would then be considered inoperable, and TS 3.8.1.2 would require refueling activities to be halted.

In Amendment No. 75, the NRC revised TS 3/4.8.1, increasing the surveillance interval for SR 4.8.1.1.2.d surveillance tests from 18 months to at least once per refueling (24 months). However, the 25% surveillance interval extension generally permitted under TS 4.0.2 was disallowed. In the safety evaluation, the NRC staff found the 24-month surveillance interval acceptable based on the following: (1) the failure history indicates the AC power systems at SONGS 2 and 3 have been extremely reliable, (2) the conduct of the weekly, quarterly, and monthly surveillance tests ensure system capability, and (3) the 25% extension allowed under TS 4.0.2 for the 18-month surveillance interval already allowed a 22½ month interval.

The proposed change only affects the frequency of the 24-month SR 4.8.1.1.2.d.1 inspection of the DGs on a one-time basis. The weekly,

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quarterly, monthly, and remaining SR 4.8.1.1.2.d refueling interval surveillances will continue to provide effective indications of system capability. The proposed change will not affect these surveillances. SCE previously requested and received a one month surveillance interval extension to SR 4.8.1.1.2.d for Unit 2 Cycle 4 operation. NRC approval of that request was also granted with Amendment No. 75 on August 25, 1989.

SCE believes this proposed extension of one month, on a one-time basis, will not significantly affect the capability of the diesel generators to perform their function, and is therefore acceptable. The diesel generator manufacturer, MKW Power Systems, Inc. agrees with this assessment of diesel generator capability. The Cycle 6 refueling outage is currently scheduled to start on August 17, 1991. The expiration date of the A-Train DG SR 4.8.1.1.1.d.1 refueling surveillance inspection is September 21, 1991. Therefore, amendment approval is requested prior to September 21, 1991.

If you have any questions regarding this proposed change, please let me know.

Very truly yours,

A handwritten signature in cursive script, which appears to read 'David S. Bay', is positioned below the typed name.

Enclosure

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