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SUBJECT: Forwards application for amend to Licenses NPF-10 & NPF-15, changing "Auxiliary Feedwater Sys," to identify AFW performs dual function in event requiring steam generator isolation & secondary heat removal.

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June 17, 1991

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U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
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Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
Amendment Application Nos. 106 and 91  
San Onofre Nuclear Generating Station Units 2 and 3

Reference: Proposed Technical Specification Change No. NPF-10/15-224  
San Onofre Nuclear Generating Station Units 2 & 3

This letter provides Amendment Application No. 106 to Facility Operating License NPF-10 and Amendment Application No. 91 to Facility Operating License NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3, respectively. These Amendment Applications consist of Proposed Technical Specification Change NPF-10/15-339 (PCN-339).

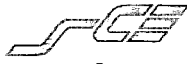
PCN-339 requests a change to Technical Specification (TS) 3/4.7.1.2, "Auxiliary Feedwater System," to identify that the Auxiliary Feedwater System (AFW) performs a dual function in an event which requires steam generator isolation and secondary heat removal. Currently, TS 3/4.7.1.2 defines the operability requirements of the system to ensure emergency feedwater flow will be available upon receipt of an Emergency Feedwater Actuation Signal (EFAS). But no operability requirements, and hence no action statements, exist to define the operability requirements to ensure that the system will respond to a Main Steam Isolation Signal (MSIS). This situation has resulted in several entries into TS 3.0.3 as documented in Licensee Event Reports 88-030, 88-037, 89-011 (Docket 50-361) and 90-011 (Docket 50-362).

A change to the AFW TS was previously submitted as a part of PCN-224 (Reference), which additionally proposed to change Technical Specification 3/4.7.1.5, "Main Steam and Feedwater Isolation Valves," to include operability requirements for the Main Feedwater Isolation Valves (MFIVs) and Main Feedwater Backup Isolation Valves (MFBIVs) similar to the operability requirements of the Main Steam Isolation Valves (MSIVs). The NRC staff did not agree with the justification provided for the MFIVs and MFBIVs, and subsequently denied issuance of the proposed change.

A new TS section is being added to address the operation of the AFW system when the steam generators are being used for decay heat removal. The existing AFW TS section is renumbered to be 3/4.7.1.2.1 and the new section is 3/4.7.1.2.2. The new section documents the current practice of maintaining the operability of the AFW system components required to support steam generator heat removal capability in mode 4.

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Additionally, a clarification to Surveillance Requirements 4.7.1.2.1.b.1 and 4.7.1.2.1.b.2 is provided to more accurately depict the functional testing performed every refueling outage to confirm that the two motor-driven AFW pumps will start and the steam supply valves to the turbine-driven AFW pump will open upon receipt of an EFAS.

It should also be noted that the values cited for AFW flow in section 3/4.7.1.2 of the Bases are currently being revised. The new values will be provided at a later date.

If you have any questions regarding these changes, please let me know.

Very truly yours,

Enclosures

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