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SUBJECT: Submits supplemental info re Proposed Tech Spec Change  
 NPF-10/15-276, revising 18-month channel calibr surveillance  
 test interval of TS 3/4.3.3.5, "Remote Shutdown  
 Instrumentation." Results of reevaluation listed.

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July 27, 1991

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
Proposed Technical Specification Change No. NPF-10/15-276  
Remote Shutdown Instrumentation Surveillance Test Interval  
San Onofre Nuclear Generating Station  
Units 2 and 3

Proposed Technical Specification Change Number NPF-10/15-276 (PCN-276) was submitted to revise the 18 month channel calibration surveillance test interval (STI) of Technical Specification 3/4.3.3.5, Remote Shutdown Instrumentation, to 24 months to be consistent with extended fuel cycle operation. The methodology used to justify this extension included performing an instrument drift study to evaluate the effect of increasing the time between surveillances from 22 1/2 months to 30 months (the maximum time using the 25% extension permitted under Surveillance Requirement 4.0.2 for 18 and 24 months, respectively), calculating the instrument total loop uncertainty (TLU), and applying a functional analysis to evaluate the effects of the revised total instrument errors on specific Abnormal Operating Instructions (AOI) steps.

The license amendment request was approved by NRC Amendment Numbers 88 and 78 for San Onofre Units 2 and 3, respectively. As a result of a subsequent NRC inspection of the Instrument Setpoint Methodology conducted in February of this year, concerns were raised about the Functional Analysis methodology which resulted in issuance of a Notice of Violation to the Southern California Edison (SCE) Company. This Functional Analysis methodology was used to form part of the basis justifying the STI extension in PCN-276. Therefore, SCE notified the NRC that administrative controls would be established to restrict the channel calibration STI for the Remote Shutdown (RSD) Instrumentation to 18 months. In our letter, we indicated that a reevaluation of the engineering analyses used to support PCN-276 would be completed by July 29, 1991. We also indicated that we would advise the NRC if any revisions to the License Amendment or Safety Evaluation Report (SER) for PCN-276 were deemed necessary by the reevaluation.

That reevaluation as indicated above, consists of three parts:

a) Instrument Drift

This phase of the study determined the effects of extending the STI from 22 1/2 months to 30 months. As was indicated in PCN-276, the

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"Best Estimate" for instrument drift could have been used, although in support of PCN-276, SCE principally elected to use the more conservative "95/95" value. However, in the current evaluation, SCE has elected to exclusively use the "95/95" value. These calculations were reconfirmed even though these had not been an area of concern from the NRC setpoint audit.

b) TLU Calculations

This phase of the study reevaluated the instrument TLUs based on recommended practice methodologies from the Instrument Society of America. The TLU is the combination of the instrument drift and other instrument uncertainties. Again, in the current evaluation, SCE has elected to use the more conservative "95/95" value in place of a "Best Estimate" value. The calculations which determine the effects of drift and establish a TLU are complete. These calculations confirm that the STI increase does not have a significant effect on the TLU.

c) Functional Analysis

The AOI was evaluated on a step-by-step basis to determine the available engineering margin and to compare that margin to the calculated TLU. Where the new TLU value exceeds the procedure step value, then the action or judgement performed by the operator may not be consistent with the intent of that step in the AOI. The effects of this action or judgement on the ability to safely cool down the plant are then evaluated. The work to define and create an engineering basis for the AOI values has progressed to the point that these new calculations have been prepared and issued for internal SCE review.

This evaluation of the effects of this operator action or judgement, has concluded that these differences would not culminate in preventing the operator from cooling down the reactor or in damaging the primary reactor coolant pressure boundary. For example, there are cases where the new calculated TLUs may result in lifting safety relief valves even when the operators are in compliance with the AOI operating limitations.

While this occurrence of itself would not cause any safety limits to be exceeded, this is considered undesirable. Safety and prudence, therefore, dictate that further effort is mandated to preclude or mitigate such actions or judgements. Therefore, SCE will revise certain AOI operating steps in order to preserve the current intended operating parameters (e.g.: not unnecessarily lifting the safety relief valves). It is noted that this effort would have been required whether or not the STI extension had been requested or evaluated.



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-3-

Pending completion of these changes to the AOIs to fully close the functional analysis phase of this program, SCE will continue to administratively limit the STI for RSD Instrumentation to 18 months. When these procedures are revised, then the conclusions stated in PCN-276 and the SER will be valid for a 24 month fuel cycle: comparisons of the calculated uncertainties to the allowable uncertainties demonstrate that the operator has sufficiently accurate information to maintain the unit in a hot shutdown condition or to achieve cold shutdown from outside the control room. Therefore, no revisions to the licensing documentation or SER are required. We anticipate these AOI procedure changes to be completed by October 15, 1991.

Should you have any questions regarding this information, or wish to discuss this further, please do not hesitate to call me.

Very truly yours,

*R M Benbow*