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50-362 San Onofre Nuclear Station, Unit 3, Southern Californ 05000362
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Document Control Branch (Document Control Desk)

SUBJECT: Advises that proposed amends to update TS pressure-temp limits & LTOP enable temps will be submitted no later than 920911 & 1030 for Units 3 & 2,respectively.Units will continue to operate w/Unit 2 pressure-temp limits.

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February 24, 1992

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

Gentlemen:

Subject: Docket No. 50-361 and 50-362
Proposed License Amendments to Update the Pressure-Temperature Limits and Low Temperature Overpressure Protection Enable Temperatures
San Onofre Nuclear Generating Station
Units 2 and 3

References: 1. December 20, 1991, letter from Harold B. Ray (SCE) to Document Control Desk, Subject: Docket Nos. 50-361 and 50-362, Amendment Application Nos. 113 and 97, Changes to Technical Specifications 3/4.4.8.3.1, 3/4.1.2.3, and 3/4.5.3 San Onofre Nuclear Generating Station, Units 2 and 3

2. April 24, 1990, letter from F. R. Nandy (SCE) to Document Control Desk, Subject: Docket Nos. 50-361 and 50-362, Electrical Safety System Functional Inspection, San Onofre Nuclear Generating Station, Units 2 and 3

In Reference 1 Southern California Edison (SCE) committed 1) to submit no later than February 14, 1992, an operating license amendment application updating the Unit 3 Reactor Coolant System (RCS) Pressure-Temperature (PT) limits and the Low Temperature Overpressure Protection (LTOP) enable temperature, and 2) to submit no later than May 15, 1992, a proposed amendment updating the Unit 2 PT limits and LTOP enable temperature. The Units 2 and 3 PT limit curves are being updated based on 1) the test and analysis results of the first Unit 3 surveillance capsule specimen withdrawn after 4.33 Effective Full Power Years of Operation (EFPY), and 2) the methodology for calculating LTOP enable temperatures as recommended by NUREG-0800 Branch Technical Position (BTP) RSB 5-2, Revision 1, "Overpressure Protection of Pressurized Water Reactors While Operating at Low Temperatures." The methodology in BTP RSB 5-2, Revision 0 was used for previous calculations of the Units 2 and 3 LTOP enable temperatures.

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Southern California Edison (SCE) has an ongoing program reevaluating all safety-related controls setpoints at San Onofre Units 2 and 3 in response to an Electrical Safety System Functional Inspection (SSFI) as stated in Reference 2. Part of this comprehensive program involves calculating instrument total loop accuracy or Total Loop Uncertainty (TLU). The TLU calculations for the control room instruments related to the PT limits have not been completed. Formal Units 2 and 3 control room instrument TLU calculations and revised PT limit calculations must be completed before we can finalize the Units 2 and 3 PT limit curves. Therefore, the proposed amendments to update the Technical Specification PT limits and LTOP enable temperatures will be submitted no later than September 11, 1992, and October 30, 1992, for Units 3 and 2, respectively.

There is no safety impact due to the delay in submitting these amendment applications to update the Units 2 and 3 PT limits. The existing Unit 2 PT limits are more conservative than the Unit 2 PT limits will be because the margins used in the calculations supporting the existing limits are overly conservative and the RCS operating limits during heatup and cooldown are, therefore, also conservative. The existing Unit 2 PT limits are also more conservative than the Unit 3 PT limits will be because, in addition to conservative operating limits, the Adjusted Reference Temperature (ART) for Unit 2 at 8 EFPY is greater than the ART for Unit 3 at 8 EFPY.

Therefore, Unit 2 will continue to operate with its existing PT limits until approval of the license amendment which updates the Unit 2 PT limits. Unit 3 will continue to operate using the existing Unit 2 P-T limits until the NRC approves the license amendment which updates the Unit 3 PT limits.

If you have any questions regarding these matters, 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