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 AUTH.NAME AUTHOR AFFILIATION
 NADY,F.R. Southern California Edison Co.
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SUBJECT: Forwards overpressure & blowdown conclusions re main steam safety valve ring setting mods.

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Southern California Edison Company

23 PARKER STREET
IRVINE, CALIFORNIA 92718

February 9, 1990

F. R. NANDY
MANAGER OF NUCLEAR LICENSING

TELEPHONE
(714) 587-5400

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Main Steam Safety Valve Ring Setting Modification Analysis Results
San Onofre Nuclear Generating Station
Units 2 and 3

This letter forwards Southern California Edison's (SCE) overpressure and blowdown conclusions regarding the ring setting modifications of the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, Main Steam Safety Valves (MSSVs). SCE committed to revise the overpressure analysis and provide follow-up information to the NRC staff in a meeting on May 23, 1989 in Rockville, Maryland. The enclosed report provides the conclusions obtained from the analyses and fulfills SCE's follow-up information commitment. The SONGS Unit 2 analysis indicates that the potential radiological effects of the increased MSSV blowdown with generic ring settings remain within a small fraction of the 10 CFR 100 limits and that overpressure protection with MSSVs with generic ring settings is adequate. The specific results are in the process of being incorporated into the Updated Final Safety Analysis Report (UFSAR) and will be reflected in the 1990 update.

The ring settings for the SONGS Unit 2 MSSVs were set to generic values during the Unit 2 Cycle 5 refueling outage to achieve the stamped capacity lift. The ring settings for the SONGS Unit 3 MSSVs will be set to the generic values during the upcoming Unit 3 Cycle 5 refueling outage. The SONGS Unit 3 Cycle 5 refueling outage is scheduled to start in April 1990.

The SONGS Unit 3 analysis, with as-shipped MSSV factory ring settings, indicates that overpressure protection with all MSSVs operable is adequate. However, the enclosed report concludes that for SONGS Unit 3 with an inoperable MSSV, the secondary design pressure limit of 110% may be reached if the plant was allowed to operate at the linear power level-high trip setpoint given in Table 3.7-2 of Technical Specification 3/4.7.1.1, "Safety Valves." Thus, until the MSSV ring settings are set to the new generic values, the linear power level-high trip setpoint values of Table 3.7-2 for inoperable MSSVs may not be sufficiently conservative for SONGS Unit 3. Therefore, SCE has revised the operating procedures for SONGS Unit 3 to restrict the

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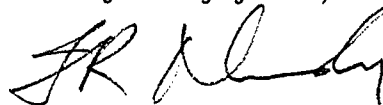
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operating power level with inoperable MSSV's. These administrative controls limit the operating power level in order to maintain sufficient margin to the trip setpoints of Table 3.7-2 whenever the ACTION statement of Technical Specification 3/4.7.1.1 is invoked. These Administrative controls will remain in effect as long as the Unit 3 MSSVs remain with factory ring settings. A technical specification change to remove this potential non-conservatism is unnecessary at this time due to several reasons. First, a limited amount of time remains to the beginning of the SONGS Unit 3 refueling outage. During the upcoming outage the ring settings will be modified, restoring the MSSVs to acceptable performance. Second, administrative controls have been instituted into the operating procedures to limit the permitted power level in the event of inoperable MSSVs. Further, the evaluations are based on analyses with very conservative assumptions that maximize the secondary side pressure. Finally, these analyses are based on a SONGS Unit 3 cycle burnup equivalent to 343 effective full power days (EFPD), and they do not reflect the present SONGS Unit 3 cycle burnup which acts to mitigate the peak pressures. Therefore, SCE concludes that the administrative actions that have been implemented are sufficient to ensure safe operation for the remainder of Cycle 4 for SONGS Unit 3.

In addition, Licensee Event Report No. 89-010, "Main Steam Safety Valve Flow Capacity Apparently Less Than Nameplate Rating," dated June 30, 1989, is presently under review and will be revised to reflect the current knowledge and status of the Unit 3 MSSVs. The revision will be completed and submitted to NRC by March 16, 1990. Furthermore, there is an on-going review of the MSSV technical specification bases. This review has so far identified only an editorial change. Any changes to the technical specification bases for the MSSV's will be submitted by June 30, 1990.

If you have any questions, please feel free to call me.

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