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SUBJECT: Describes bases of possible request for temporary relief from Tech Spec 3.4.2.

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March 8, 1990

Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Subject: **Docket No. 50-361**
**Request for Temporary Relief From Technical Specification 3.4.2**
**San Onofre Nuclear Generating Station, Unit 2**

Dear Mr. Martin:

My letter to Mr. C. W. Caldwell (NRC) dated March 5, 1990 summarizes the results of the investigation by Southern California Edison (SCE) into the causes and consequences of an unplanned trip of San Onofre Unit 3 which occurred on February 23, 1990. It includes discussion concerning the possible effect of Pressurizer Safety Valve (PSV) temperature distribution on the opening pressure of the valves. It indicates that, if it appears from SCE's review of data and plant conditions that the Unit 2 PSV temperatures may be significantly different than those which existed when their opening pressures were set, then the temperatures will be measured and the PSVs tested and reset as necessary.

The purpose of this letter is to describe the bases of a possible request for temporary relief from a provision of San Onofre Unit 2 Technical Specification (TS) 3.4.2 in order to support taking this action. The TS includes the following concerning the PSVs as ACTION b.:

> "The provisions of Specification 3.0.4 may be suspended for one valve at a time for up to 18 hours for entry into and during operation in MODE 3 for the purposes of setting the pressurizer code safety valves under ambient (hot) conditions provided a preliminary cold setting was made prior to heatup."

The PSVs currently installed in Unit 2 were set under specified temperature conditions at Wyle Laboratories, as described for the Unit 3 valves in my March 5 letter to Mr. Caldwell. These specified temperature conditions were intended to establish the ambient (hot) conditions which would exist



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during service in the plant. Therefore, the PSVs did not receive a preliminary cold setting following installation and ACTION b of TS 3.2.4 was not entered to reset the valves in MODE 3.

If, based on temperature measurements, SCE determines that the Unit 2 PSV opening pressures should be checked, the unit will enter MODE 3 from power operations, rather than from "cold" conditions as anticipated in ACTION b. above. Other than the direction of entry into MODE 3, the circumstance involving the need to set the PSVs "under ambient (hot) conditions" is considered to be equivalent. That is, TS 3.2.4 allows 18 hours following entry into MODE 3 for resetting PSVs that were initially set under cold conditions. By comparison, SCE proposes to allow 18 hours following entry into MODE 3 to verify the setting of PSVs that were initially set under hot conditions.

The use of the 18 hour provision as proposed by SCE appears entirely consistent with the intent of TS 3.2.4, ACTION b. Also, the uncertainty in PSV opening pressure due to temperature differences will certainly be less when comparing plant ambient (hot) conditions to the specified laboratory temperature distribution than when comparing the same plant conditions to a preliminary cold setting, as contemplated by ACTION b. Thus, the proposed action is considered to be conservative with respect to the safety bounds established by the existing TS provisions.

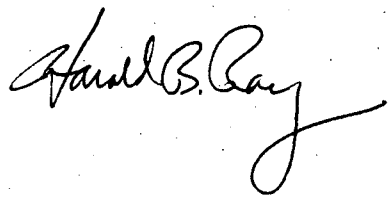
It is important to note, as discussed in my March 5 letter, that the effect of temperature on PSV opening pressure is not considered to be predictable for valves generally, but is probably unique for each valve. Potential differences between in-service temperatures for the Unit 2 valves and those used in setting the valves in the laboratory cannot be used to predict changes in opening pressure. Based on available information, SCE considers the Unit 2 PSVs to be operable, and a decision to enter MODE 3 to verify their opening pressures under the present circumstances involves far less uncertainty than would entering MODE 3 to verify opening pressures following cold setting.

Accordingly, SCE respectfully requests the subject temporary relief in this instance only in order to permit ACTION b. to apply to a possible entry into MODE 3 from power operations, rather than from cold conditions.

We have considered what action to take in the absence of the requested temporary relief. It appears that we would have to proceed immediately to MODE 5, reset the valves cold and then return to MODE 3 and reset them hot. We believe this action would involve a significant increase in uncertainty and plant hazard, with no benefits in terms of public safety.

We expect to be prepared to obtain the PSV temperature measurements and decide if verification of setpoints is required on March 10. If we conclude that setpoint verification is appropriate, the relief discussed in this letter will be necessary. Please let us know the appropriate person to contact on March 10 or 11 in the event the temporary relief is needed. We are prepared to promptly provide any additional information which may be needed.

Sincerely,



cc: C. W. Caldwell, Senior NRC Resident Inspector, San Onofre
C. Trammell, NRC Project Manager, NRR