

DESCRIPTION OF PROPOSED CHANGE NPF-10-81 AND SAFETY ANALYSIS

This is a request to revise Technical Specification 4.0.2, SURVEILLANCE REQUIREMENTS.

Existing Specification

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with:

- a. A maximum allowable extension not to exceed 25% of the surveillance interval, and
- b. The combined time interval for any 3 consecutive surveillance intervals not to exceed 3.25 times the specified surveillance interval.

Proposed Specification

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval* with:

- a. A maximum allowable extension not to exceed 25% of the surveillance interval, and
- b. The combined time interval for any 3 consecutive surveillance intervals not to exceed 3.25 times the specified surveillance interval.

*18 month interval Surveillance Requirements which cannot be completed without an outage prior to October 1, 1983 need not be completed prior to that date.

Reason for Proposed Change

Because of the extended length of the Unit 2 startup test program, several 18 month surveillance requirements are becoming due before the anticipated completion of startup testing and during the summer peak load period. The limiting surveillance requirements to be performed are Plant Protection System (PPS) response time testing (Procedure S023-II-3.1) and Accident Monitoring Instrumentation Calibration (Procedure S023-II-8.15). Including the time required for shutdown and return to power, these surveillances will require approximately four to six weeks to accomplish. The PPS surveillance requirement is due on July 12, 1983 (including the 25% allowed extension). Although SCE has experienced a large amount of downtime recently, at no time during these periods did SCE expect to remain down long enough to complete these surveillances.

The startup test program is not expected to be completed by July 12, 1983. To meet the surveillance requirement, the plant would have to be brought down to perform the surveillances followed by a return to power only to be tripped again as required by the startup test program. This is undesirable in that it additionally cycles the plant, interrupts the startup test program and would occur during the peak summer load period.

The proposed change alleviates this problem by deferring to October 1, 1983 the 18 month surveillance requirements which would require an outage during the intervening period.

Safety Analysis

The proposed change delays the performance of Plant Protection System (PPS) response time testing and Accident Monitoring Instrumentation calibration by an additional two and one half months. This delay is considered to have an insignificant effect on the unavailability of the systems involved.

PPS response time testing is due for only one of four PPS channels. Because of staggered testing, the normal interval between surveillances for an individual channel is 72 months. At that point, the periods since the last surveillances for the other three channels are 54, 36 and 18 months. In the present case, surveillances on all four channels have been performed within the last 22 months. Clearly, a delay of two and one half months in the performance of the first channel surveillance will have an insignificant effect on system unavailability when compared with the system unavailability associated with surveillances being performed on each channel at 72 month intervals. Furthermore, the high level of redundancy within the PPS reduces the dependence of system unavailability on surveillance interval. Additionally, quarterly and monthly functional checks ensure operability of the PPS.

Similarly, in the case of accident monitoring instrumentation calibrations, monthly channel checks provide a qualitative assessment of operability. Delaying calibration by an additional 2 1/2 months will not have a significant impact on operability.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-81 does not present significant hazard considerations not described or implicit in the Final Safety Analysis; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.