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SUBJECT: Revised application to amend License NPF-10 delaying until
 831001 18-month interval surveillance requirements which
 cannot be completed w/o extended outage.

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June 10, 1983

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Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-361
San Onofre Nuclear Generating Station
Unit 2

Southern California Edison Company's (SCE's) letter dated June 7, 1983 submitted a proposed change to the Unit 2 Technical Specifications. The proposed change requested a delay until October 1, 1983 for those 18 month interval surveillance requirements which cannot be completed without an extended outage in the intervening period.

As a result of discussions with the staff on June 8, 1983, the proposed change has been revised. Enclosed for your review and approval is a copy of the revised proposed change. The revised proposed change reduces the scope of applicability of the requested delay and includes an expanded safety analysis which more completely addresses the conclusion that the proposed change involves no significant hazards considerations.

The due dates for 18 month interval surveillances have been re-evaluated. The due date for the limiting surveillance has been determined to be July 25, 1983 vice July 12, 1983 as reported in the June 7, 1983 submittal. Therefore, SCE requests approval of the proposed change by July 25, 1983.

If you have any questions concerning the enclosed information, please call me.

Very truly yours,

M. O. Medford for KPB

Enclosure

cc: Harry Rood, NRC (to be opened by addressee only)
Joseph O. Ward, California State Department of Health

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

This is a request to revise Technical Specifications 4.3.1, REACTOR PROTECTIVE INSTRUMENTATION, 4.3.2, ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION and, 4.3.3.6, ACCIDENT MONITORING INSTRUMENTATION.

Existing Specifications

REACTOR PROTECTIVE INSTRUMENTATION

4.3.1.1 Each reactor protective instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations for the MODES and at the frequencies shown in Table 4.3-1.

4.3.1.2 The logic for the bypasses shall be demonstrated OPERABLE prior to each reactor startup unless performed during the preceding 92 days. The total bypass function shall be demonstrated OPERABLE at least once per 18 months during CHANNEL CALIBRATION testing of each channel affected by bypass operation.

4.3.1.3 The REACTOR TRIP SYSTEM RESPONSE TIME of each reactor trip function shall be demonstrated to be within its limit at least once per 18 months. Each test shall include at least one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific reactor trip function as shown in the "Total No. of Channels" column of Table 3.3-1.

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

4.3.2.1 Each ESFAS instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations for the MODES and at the frequencies shown in Table 4.3-2.

4.3.2.2 The logic for the bypasses shall be demonstrated OPERABLE during the at power CHANNEL FUNCTIONAL TEST of channels affected by bypass operation. The total bypass function shall be demonstrated OPERABLE at least once per 18 months during CHANNEL CALIBRATION testing of each channel affected by bypass operation.

4.3.2.3 The ENGINEERED SAFETY FEATURES RESPONSE TIME of each ESFAS function shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the "Total No. of Channels" Column of Table 3.3-3.

ACCIDENT MONITORING INSTRUMENTATION

4.3.3.6 Each accident monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-7.

Proposed Specifications

REACTOR PROTECTIVE INSTRUMENTATION

4.3.1.1 Each reactor protective instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations for the MODES and at the frequencies shown in Table 4.3-1.*

4.3.1.2 The logic for the bypasses shall be demonstrated OPERABLE prior to each reactor startup unless performed during the preceding 92 days. The total bypass function shall be demonstrated OPERABLE at least once per 18 months during CHANNEL CALIBRATION testing of each channel affected by bypass operation.*

4.3.1.3 The REACTOR TRIP SYSTEM RESPONSE TIME of each reactor trip function shall be demonstrated to be within its limit at least once per 18 months. Each test shall include at least one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific reactor trip function as shown in the "Total No. of Channels" column of Table 3.3-1.*

* 18 month interval surveillance requirements which cannot be completed without an outage prior to October 1, 1983 may be deferred until that date.

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

4.3.2.1 Each ESFAS instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations for the MODES and at the frequencies shown in Table 4.3-2.**

4.3.2.2 The logic for the bypasses shall be demonstrated OPERABLE during the at power CHANNEL FUNCTIONAL TEST of channels affected by bypass operation. The total bypass function shall be demonstrated OPERABLE at least once per 18 months during CHANNEL CALIBRATION testing of each channel affected by bypass operation.**

4.3.2.3 The ENGINEERED SAFETY FEATURES RESPONSE TIME of each ESFAS function shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the "Total No. of Channels" Column of Table 3.3-3.**

** 18 month interval surveillance requirements which cannot be completed without an outage prior to October 1, 1983 may be deferred until that date.

ACCIDENT MONITORING INSTRUMENTATION

4.3.3.6 Each accident monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-7.**

** 18 month interval surveillance requirements which cannot be completed without an outage prior to October 1, 1983 may be deferred until that date.

Reason for Proposed Change

Because of the extended length of the Unit 2 startup test program, 18 month surveillance requirements for Reactor Protective Instrumentation, Engineered Safety Features Actuation System Instrumentation (ESFAS) and Accident Monitoring Instrumentation are becoming due before the anticipated completion of startup testing and during Southern California Edison's (SCE) summer peak load period. Two governing procedures are involved (governing procedures require the performance of other procedures which implement the requirements of the Technical Specifications): Procedure S023-II-3.1, Plant Protection System (PPS) Response Time Test for Channel A, which encompasses the 18 month surveillance requirements of Technical Specifications 4.3.1.1, 4.3.1.2, 4.3.1.3, 4.3.2.1, 4.3.2.2 and 4.3.2.3; and, Procedure S023-II-8.15, Accident Monitoring Instrumentation Channel Calibration, encompassing the 18 month surveillance requirements of Technical Specification 4.3.3.6. Including the length of time required for shutdown and return to power, these surveillances will require approximately four to six weeks to accomplish. Including the 25% extension of surveillance interval allowed by Specification 4.0.2, the PPS surveillance becomes due on July 25, 1983. The Accident Monitoring Instrumentation surveillance is due on approximately August 29, 1983 on the same basis. 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.

An outage in July to satisfy these surveillance requirements is undesirable because it would further interrupt the startup test program, would occur during the summer peak load period, and it additionally cycles the plant through shutdown and startup.

The proposed change would defer these surveillance requirements until October 1, 1983, by which time the startup test program should be complete and after the summer peak load period.

Safety Analysis

The proposed change delays the PPS 18 month interval surveillance requirements by 2 1/2 months and the 18 month Accident Monitoring Instrumentation surveillance requirements by about 2 months. The acceptability of these two delays in that they involve no significant hazard considerations is discussed below.

1) Delay of PPS 18 Month Surveillance Requirement by 2 1/2 months

The proposed change delays the 18 month channel calibrations for all PPS channels and response time testing for one PPS channel.

The delay of 18 month interval PPS channel calibrations does not involve a significant increase in the probability or consequences of an accident previously evaluated for the following reasons.

- (1) The function of the plant protection system is to mitigate the consequences of transients. The PPS does not contribute to the initiation of previously evaluated accidents, but serves to mitigate their consequences. The proposed change affects only surveillance intervals for the PPS.

It does not modify the plant or its operation. Because the PPS is not an initiator of previously evaluated accidents, and the proposed change affects only PPS surveillance intervals, the proposed change does not involve an increase in the probability of accidents previously evaluated.

- (2) Channel checks and channel functional tests performed at intervals as required by Specifications 4.3.1.1 and 4.3.2.1 will ensure consistency between and operability of the channels affected by this change. It is unlikely that significant calibration drift would equally affect all redundant channels. Channel checks would therefore detect significant calibration changes in a given channel during the period of the requested extension. Channel checks are performed every twelve hours.

The diversity of parameters monitored by the PPS and the redundancy between channels monitoring each parameter ensure PPS response in the event previously evaluated accident. The proposed change therefore does not involve a significant increase in the consequences of an accident previously evaluated.

The proposed delay of 18 month interval PPS channel calibrations does not create the possibility of a new or different kind of accident from any accident previously evaluated because it does not modify the configuration of the plant or the manner in which it is operated. Since no changes to the plant or its operation are made

by the proposed change there is no increase in the possibility of creating an accident of a new or different type over what currently exists without the proposed change.

The proposed delay of the 18 month PPS channel calibrations does not involve a significant reduction in a margin of safety for the following reasons.

- (1) No setpoints are changed by the proposed change. Therefore the PPS will continue to respond to transient in the same manner as it would have without the proposed change.
- (2) As stated above, any significant channel calibration change which could result in a reduction of safety margin would likely be detected by channel checks and channel functional tests.

The proposed delay in PPS response time testing does not involve a significant increase in the probability or consequences of an accident previously evaluated for the following reasons.

- (1) As stated above, the PPS is not an initiator of any previously evaluated accidents and the proposed change only affects the PPS surveillance intervals and therefore does not increase the probability of a previously evaluated accident.
- (2) Because of staggered testing, the normal response time testing interval is 72 months once the mature surveillance schedule is reached. Since this is the first surveillance interval, the first channel test is due at 22 1/2 months. The proposed change would increase this to approximately 25 months. As noted, the normal interval for this channel is 72 months. Additionally, the other channels have been tested within the last 22 months. This situation is clearly different from the normal surveillance performed on one channel at 72 months with the periods since testing of the other 3 channels are 54, 36, 18 months. The requested delay of 2 1/2 months is insignificant in light of the normal staggered 72 month surveillance interval. The high level of redundancy within the PPS reduces the dependence of system unavailability on surveillance interval. Additionally, the channel checks and channel functional tests required by Specifications 4.3.1.1. and 4.3.2.1 ensure operability. Therefore, the proposed delay will have an insignificant effect on the PPS response to a transient and the proposed change will not involve a significant increase in the consequences an accident previously evaluated.

The proposed delay in the response time testing does not modify the configuration of the plant or the manner in which it is operated and therefore does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed delay in response time testing does not involve a significant reduction in a margin of safety because:

- (1) The proposed change does not modify any setpoints; and,
- (2) The proposed change will have an insignificant effect on the PPS response to a transient.

2) Delay of 18 Month Accident Monitor Instrumentation Channel Calibrations

The proposed change delays the 18 month Accident Monitoring Instrumentation channel calibrations until October 1, 1983. Calibration of the Reactor Coolant System Subcooling Margin Monitor is the limiting surveillance requirement and is due on approximately August 28, 1983 including the 25% Specification 4.0.2 allowed extension.

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated for the following reasons:

- (1) The instruments whose calibration is delayed by the proposed change serve an accident monitoring function. These instruments do not initiate any accident previously evaluated. The proposed change affects only these instruments and therefore cannot increase the probability of a previously evaluated accident.
- (2) During the period of the extension, the channel checks between redundant channels required by Specification 4.3.3.6 will ensure operability and detect any significant changes in channel calibration. The proposed change will therefore have an insignificant effect on the instruments response in the event of an accident and therefore the proposed change will not involve a significant increase in the consequences of an accident previously evaluated.

The proposed delay in Accident Monitoring Instrumentation calibration does not modify the configuration of the plant or the manner in which it is operated. It therefore cannot create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed delay in Accident Monitoring Instrument Calibration does not change any setpoint and, does not have any significant effect on the ability of the affected instruments to perform their intended function in the event of an accident. The proposed change therefore does not involve a significant reduction in a margin of safety.

Based on the above discussion, Proposed Change NPF-10-81 does not involve a significant hazards consideration in that it does not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. In addition, it is concluded that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (2) 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.

PWS:8333