

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON) COMPANY, ET AL. for a Class 103 license to) Acquire, Possess, and Use a Utilization) Facility as Part of Unit No. 3 of the San) Onofre Nuclear Generating Station)	DOCKET NO. 50-362 Amendment Application No. 8
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SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90,
hereby submit Amendment Application No. 8.

This amendment application consists of proposed change NPF-15-37 to Facility Operating License NPF-15, Technical Specifications incorporated as Appendix A. Proposed Change NPF-15-37 is a request to revise Technical Specification 6.2.2 to alter the scope of staff working hour control at San Onofre Nuclear Generating Station. It is the purpose of this revision to assign the proper level of station management attention to each level of safety significance, as it applies to staff working hours.

Pursuant to 10 CFR 170.22, the Proposed Change contained in Amendment Application No. 8 is considered to constitute a Class I amendment. The basis for the determination is that the Proposed Change contained in Amendment Application No. 8 is a duplicate of that contained in Amendment Application No. 22 to Operating License NPF-10 for San Onofre Nuclear Generating Station, Unit 2. The fee of \$400.00 corresponding to this determination for Proposed Change NPF-15-37 is herewith remitted as required by 10 CFR 170.22.

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DESCRIPTION OF PROPOSED CHANGE AND SAFETY ANALYSIS
PROPOSED CHANGE NOS. NPF-10-37 AND NPF-15-37
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

This is a request to revise Appendix A, Technical Specification 6.2.2, Unit Staff.

Description

The proposed changes revise the administration of staff overtime at San Onofre Nuclear Generating Station, Units 2 and 3. The proposed changes will strictly limit the working hours of the staff most important to plant safety, the minimum shift crew, to the guidelines of the Commission policy on plant staff working hours, as defined in Generic Letter 82-12. The remainder of the staff identified in the Commission policy will have their working hours monitored by station management to assure that overtime assigned is not considered to be excessive. The tasks performed by the staff, other than the operators, are subject to quality assurance, quality control, startup testing and other forms of independent verification. Thus, the San Onofre Nuclear Generating Station policy on staff working hours, as proposed, will assign the proper level of management attention to each level of safety significance, as it applies to staff working hours.

Existing Technical Specifications

Unit 2

See Attachment A

Unit 3

See Attachment C

Proposed Technical Specifications

Unit 2

See Attachment B

Unit 3

See Attachment D

Safety Analysis

The proposed changes discussed above shall be deemed to constitute a significant hazard consideration if there is a positive finding in any of the following areas.

1. Will operation of the facility in accordance with these proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The administrative controls imposed by these proposed changes will ensure that the use of plant staff overtime is monitored and controlled. The maintenance of plant staff in an alert state will reduce the probability or consequences of an accident previously evaluated. Therefore, it can be reasoned that operation of the facility in accordance with these proposed changes will not increase the probability or consequences of an accident previously evaluated.

2. Will operation of the facility in accordance with these proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The revision of overtime restrictions is administrative in nature and does not alter the configuration or operations of the plant in any way. Therefore, it can be reasoned that the operation of the facility in accordance with these proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Will operation of the facility in accordance with these proposed changes involve a significant reduction in a margin of safety?

Response: No

The limitation of staff working hours in accordance with these proposed changes will ensure that the use of plant staff overtime is monitored and controlled. The maintenance of the plant staff in an alert state will enhance the design margin of safety. Therefore, it can be reasoned that these proposed changes to the administrative section of the technical specifications do not involve a significant reduction in a margin of safety.

Safety and Significant Hazards Determination

Based on the Safety Analysis, it is concluded that (1) proposed changes NPF-10-37 and NPF-15-37 do not involve a significant hazards consideration as defined by 10CFR50.92; and (2) there is reasonable assurance that the health and safety of the public will not be endangered by these proposed changes; and (3) this action will not result in a condition which alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

Attachment A - Existing Specifications, Unit 2

Attachment B - Proposed Specifications, Unit 2

Attachment C - Existing Specifications, Unit 3

Attachment D - Proposed Specifications, Unit 3

ATTACHMENT A