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 AUTH. NAME: AUTHOR AFFILIATION
 MEDFORD, M.O. Southern California Edison Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Application for amend to License NPF-10 & NPF-15, consisting
 of Proposed Change NPF-10/15-193 revising Tech Spec
 3/4.9.12, "Fuel Handling Bldg Post-Accident Cleanup Filter
 Sys." Fee paid.

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Southern California Edison Company



P. O. BOX 800
2244 WALNUT GROVE AVENUE
ROSEMEAD, CALIFORNIA 91770

M.O. MEDFORD
MANAGER, NUCLEAR LICENSING

May 30, 1985

TELEPHONE
(213) 572-1749

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 Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

Enclosed for your review and approval is a proposed change to the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 Technical Specifications. Proposed Change NPF-10/15-193 (PCN-193) revises Technical Specification 3/4.9.12, "Fuel Handling Building Post Accident Cleanup Filter System (FHBPAFCS)."

Proposed Change NPF-10/15-193 would permit fuel handling operations to continue beyond seven days with one train of FHBPAFCS inoperable provided the remaining operable train is operated for at least 15 minutes every seven days to demonstrate its continued operability. The proposed change will enable modifications to be made to the component cooling water system (CCW) which may affect operability of one train of FHBPAFCS while permitting fuel handling operations to continue in parallel during the upcoming Unit 3 refueling outage. It is estimated that this change, if approved, would save approximately 9 days of critical path time during the outage. Therefore, SCE respectfully requests expeditious review and approval of the proposed change. The Unit 3 refueling outage is currently anticipated to begin August 1, 1985 with fuel handling operations to begin shortly thereafter.

In accordance with 10 CFR 170.12, enclosed is the required amendment application fee of \$150.00. A formal request for these changes will be included in our next formal amendment application.

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Rec'd w/Check #150.00

Mr. G. W. Knighton

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

Very truly yours,

M. O. Medford

Enclosures

cc: Joseph O. Ward, California Department of Health Services
Harry Rood, NRC (To be opened by addressee only)
F. R. Huey, USNRC Senior Resident Inspector, Units 1, 2 and 3

DESCRIPTION AND SAFETY ANALYSIS OF
PROPOSED CHANGE NPF-10/15-193

This is a request to revise Technical Specification 3/4.9.12, "Fuel Handling Building Post-Accident Cleanup Filter System."

Description

The proposed change would revise Technical Specification (T. S.) 3/4.9.12, "Fuel Handling Building Post-Accident Cleanup Filter System." T. S. 3/4.9.12 requires the operability of the two independent fuel handling building post-accident cleanup filter systems. The purpose of the fuel handling building post-accident cleanup filter system is to ensure that any radioactive material released from an irradiated fuel assembly after a fuel handling accident will be filtered through the HEPA filters and charcoal adsorbers. The action required by T. S. 3/4.9.12 if one of the two filter systems becomes inoperable, is to restore the inoperable system to operable status within 7 days or suspend operations involving movement of fuel within the storage pool or operation of the fuel handling machine over the storage pool. The proposed change would revise the action in the event of one of the two filter systems becoming inoperable to require that the remaining filter system be demonstrated operable within 12 hours and at least once every seven days thereafter by starting the system and operating it for a minimum of 15 minutes.

Existing Technical Specifications:

Unit 2: See Attachment "A"
Unit 3: See Attachment "B"

Proposed Technical Specifications:

Unit 2: See Attachment "C"
Unit 3: See Attachment "D"

Safety Analysis

The proposed change described above shall be deemed to involve a significant hazards consideration if there is a positive finding in any of the following areas:

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

Safety Analysis (Continued)

Response: No

The fuel handling building post-accident cleanup filter system has no effect on the probability of an accident. As described in the Final Safety Analysis Report (FSAR) Section 15.7.3.4, the consequences of a postulated fuel handling accident are well within the criteria of 10 CFR 100 even if the fuel handling building post-accident cleanup filter system is not taken into account. The remaining one hundred percent capacity fuel handling building post-accident cleanup filter system will still be available and will be demonstrated to be operable. Thus there is no significant increase in the consequences of a previously evaluated accident.

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

Response: No

The fuel handling building post-accident cleanup filter system serves as an accident mitigation system. This proposed amendment 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 this proposed amendment involve a significant reduction in a margin of safety?

Response: No

The remaining one hundred percent capacity fuel handling building post-accident cleanup filter system will still be available and will be demonstrated to be operable every 7 days. Thus this proposed amendment will not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (vi) relates to a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan (SRP).

In this case, SRP Section 15.7.4, "Radiological Consequences of Fuel Handling Accidents," provides the pertinent acceptance criteria. SRP Section 15.7.4, part II provides that the plant site and dose mitigating Engineered Safety Features systems are acceptable with respect to the radiological consequences of a postulated fuel handling accident if the calculated whole body and thyroid doses at the exclusion area and low population zone boundaries are well within the exposure guideline values of 10 CFR Part 100, paragraph 11. "Well within" means 25 percent or less of the 10 CFR Part 100 exposure guideline values, i.e., 75 Rem for the thyroid and 6 Rem for the whole body doses.

Safety Analysis (Continued)

Table 15.7-6 of the FSAR indicates that if 236 fuel rods are assumed to be damaged in a fuel handling accident with no filtration assumed in the fuel handling building, the dose rates would be 74.3 Rem thyroid and 0.71 Rem whole body at the exclusion area boundary and 2.1 Rem thyroid and 0.02 Rem whole body at the low population zone boundary.

Thus requiring one fuel handling building post-accident cleanup filter system to remain operable and be demonstrated operable clearly meets the acceptance criteria of the SRP and the proposed change is similar to example (vi).

Safety and Significant Hazards Determination

Based on the above discussion, the proposed change 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; (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 Environment Statement.

ATTACHMENT A
EXISTING SPECIFICATION - UNIT 2

REFUELING OPERATIONS

3/4.9.12 FUEL HANDLING BUILDING POST-ACCIDENT CLEANUP FILTER SYSTEM

LIMITING CONDITION FOR OPERATION

3.9.12 Two independent fuel handling building post-accident cleanup filter systems shall be OPERABLE.

APPLICABILITY: Whenever irradiated fuel is in the storage pool.

ACTION:

- a. With one fuel handling building post-accident cleanup filter system inoperable, fuel movement within the storage pool or operation of fuel handling machine over the storage pool may proceed provided the OPERABLE fuel handling building post-accident cleanup filter system is capable of being powered from an OPERABLE emergency power source. Restore the inoperable fuel handling building post-accident cleanup filter system to OPERABLE status within 7 days or suspend all operations involving movement of fuel within the storage pool or operation of the fuel handling machine over the storage pool.
- b. With no fuel handling building post-accident cleanup filter system OPERABLE, suspend all operations involving movement of fuel within the storage pool or operation of fuel handling machine over the storage pool until at least one fuel handling building post-accident cleanup filter system is restored to OPERABLE status.
- c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.12 The above required fuel handling building post-accident cleanup filter systems shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 hours with the heaters on.
- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:

ATTACHMENT B
EXISTING SPECIFICATION - UNIT 3

REFUELING OPERATIONS

3/4.9.12 FUEL HANDLING BUILDING POST-ACCIDENT CLEANUP FILTER SYSTEM

LIMITING CONDITION FOR OPERATION

3.9.12 Two independent fuel handling building post-accident cleanup filter systems shall be OPERABLE.

APPLICABILITY: Whenever irradiated fuel is in the storage pool.

ACTION:

- a. With one fuel handling building post-accident cleanup filter system inoperable, fuel movement within the storage pool or operation of fuel handling machine over the storage pool may proceed provided the OPERABLE fuel handling building post-accident cleanup filter system is capable of being powered from an OPERABLE emergency power source. Restore the inoperable fuel handling building post-accident cleanup filter system to OPERABLE status within 7 days or suspend all operations involving movement of fuel within the storage pool or operation of the fuel handling machine over the storage pool.
- b. With no fuel handling building post-accident cleanup filter system OPERABLE, suspend all operations involving movement of fuel within the storage pool or operation of fuel handling machine over the storage pool until at least one fuel handling building post-accident cleanup filter system is restored to OPERABLE status.
- c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.12 The above required fuel handling building post-accident cleanup filter systems shall be demonstrated OPERABLE:

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- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:

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ATTACHMENT C

PROPOSED SPECIFICATION - UNIT 2