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SUBJECT: Application for amends to Licenses NPF-10 & NPF-15,  
 incorporating Proposed Change NPF-10/15-228, removing valve  
 number designations & valve orifice size specified for main  
 steam line code safety valves. Fee paid.

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September 28, 1987

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U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
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 Operating Licenses NPF-10 and NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3, respectively. The proposed change, NPF-10/15-228, Safety Valves, would remove the valve number designations and valve orifice size specified for the main steam line code safety valves. The required valve lift settings remain unchanged.

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

If you have any questions regarding this request, please call me.

Very truly yours,

*M O Medford*

Enclosures

cc: H. Rood, NRR Senior Project Manager, San Onofre Units 2 and 3  
J. B. Martin, Regional Administrator, NRC Region V  
F. R. Huey, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3

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DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NPF-10/15-228

This is a request to revise Technical Specification 3/4.7.1.1, "Safety Valves."

Existing Specifications

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

Proposed Specifications

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

Description

The proposed change would modify Technical Specification 3/4.7.1.1, "Safety Valves" by revising Table 3.7-1 to remove the valve number designations and the valve orifice size for the main steam line code safety valves. This will preclude the necessity of setting a specific valve at a specific setting. The safety analysis assumes that the main steam line code safety valves are set with nine staggered set pressures per loop. There is no basis for specifying which of the nine valves per loop is set to a specific lift pressure. The required lift settings will remain unchanged by this revision.

Safety Analysis

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

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

Response: No

The purpose of this change is to decouple specific valves from a specific lift setting. In addition, the change removes the valve orifice sizes from the table. The main steam line code safety valve lift settings assumed in the safety analysis will not be changed. Therefore, operation of the facility in accordance with this proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No

The operation of the plant will not be modified by this change. The required main steam line code safety valve lift settings will not be changed. Therefore, the proposed change does 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 change involve a significant reduction in a margin of safety?

Response: No

The main steam line code safety valve lift settings assumed in the safety analysis are not altered by this change. Therefore, the proposed change will not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of 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 consideration. Example (1) relates to a change which is a purely administrative change to Technical Specifications: for example, a change to achieve consistency throughout the Technical Specifications. The main steam line code safety valves are similar in function and purpose to the pressurizer code safety valves. The valve numbers for the pressurizer code safety valves are not listed in the Technical Specifications. The removal of the valve designations from Table 3.7-1 will not affect the function of the main steam line code safety valves since each specific lift setting assumed in the safety analysis will still be required. The proposed change may be considered to provide consistency throughout the Technical Specifications since it removes the valve numbers for the main steam line code safety valves and the necessary correlation between the individual valves and the required lift settings as well as the valve orifice sizing. Therefore, the proposed change is similar to example (1) in that the deletion of the valve designation for the lift settings and the valve orifice size for the main steam line code safety valves is a purely administrative change to achieve consistency throughout the Technical Specifications.

#### Safety and Significant Hazards Determination

Based on the above safety analysis, 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; 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.