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SUBJECT: Application for amends to Licenses NPF-10 & NPF-15,
 identified as Proposed Change PCN-239, correcting error in
 Tech Specs re MSIV response times. Error invadventently
 created when Amends 60 & 49 issued on 870814. Fee paid.

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M. O. MEDFORD
MANAGER OF NUCLEAR ENGINEERING
AND LICENSING

November 4, 1987

TELEPHONE
(818) 302-1749

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 the San Onofre Nuclear Generating Station Units 2 and 3 Technical Specifications. The Proposed Change, PCN-239, corrects an error in the Technical Specifications which was inadvertently created when Amendment Nos. 60 and 49 were issued on August 14, 1987.

Amendment Nos. 60 and 49 approved a previously submitted proposed change, PCN-207, which increased the main steam isolation valve (MSIV) response times to eight seconds. Prior to submittal of PCN-207 another change, PCN-96, was submitted which increased the MSIV response times to six seconds and added an additional location to the Technical Specifications where the response times were listed. Since PCN-96 had not been approved prior to the submittal of PCN-207, an increase in the response time in the additional location added by PCN-96 was not requested. Consequently, when PCN-207 was approved after PCN-96 the response time in this additional location was not changed, creating an error. PCN-239 corrects the error.

While the error has not created an operational problem, the potential exists for an MSIV response time, when tested, to be between two different response times now listed in the Technical Specifications. Accordingly, SCE requests timely approval of PCN-239 to avoid this potential problem.

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November 4, 1987

In accordance with 10 CFR 170.12 enclosed is the required amendment application fee of \$150. A formal request for PCN-239 will be included in our next formal amendment application.

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

Very truly yours,



Enclosure

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
J. O. Ward, California Department of Health Services

DESCRIPTION OF PROPOSED CHANGE NPF-10/15-239 AND SAFETY ANALYSIS

This is a request to revise Technical Specification 3/4.3.2, "Engineered Safety Feature Actuation System Instrumentation".

Existing Specifications

Unit 2: See Attachment "A"

Unit 3: See Attachment "C"

Proposed Specifications

Unit 2: See Attachment "B"

Unit 3: See Attachment "D"

Description

The proposed change revises Technical Specification (TS) 3/4.3.2, "Engineered Safety Feature Actuation System Instrumentation" (ESFAS). TS 3/4.3.2 specifies the number of channels and type of instrumentation required to be operable, response times and periodic surveillance tests to verify operability, and actions to be taken when the minimum requirements are not met. The ESFAS instrumentation operability requirements include a response time for the Main Steam Line Isolation Valves (MSIV) which is specified in Table 3.3-5 "Engineered Safety Features Response Times". The MSIV response time is specified in two locations in Table 3.3-5, one associated with the Main Steam Isolation Signal (MSIS), the other associated with the Containment Isolation Actuation Signal (CIAS). When the San Onofre 2 & 3 Technical Specifications were originally issued, the MSIV response time was 5.0 seconds and was identified only with the MSIS entry on Table 3.3-5. Proposed change PCN-96 was submitted on November 30, 1984. PCN-96 increased the MSIV response time from 5.0 to 6.0 seconds and also added a response time of 6.0 seconds for the MSIV's under CIAS in Table 3.3-5. Prior to approval of PCN-96, SCE submitted PCN-207 which increased the MSIV response times to 8.0 seconds. Because PCN-96 had not yet been approved, PCN-207 did not request that the CIAS entry response time in Table 3.3-5 be increased to 8.0 seconds. PCN-96, which instituted a CIAS MSIV response time of 6.0 seconds, was approved by Amendments 46 and 35 for Units 2 & 3, respectively, on May 16, 1986. Subsequently when PCN-207 was approved by Amendments 60 and 49 on August 14, 1987 an editorial discrepancy between the MSIV response times listed in Table 3.3-5 under MSIS and CIAS was created. The proposed change would correct this editorial discrepancy by increasing the CIAS MSIV response time to 8.0 seconds. Note that Table 3.3-5 includes a 0.9 second allowance for instrumentation propagation delay thus, the actual table entry is increased from 6.9 to 8.9 seconds.

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 proposed change corrects an editorial discrepancy between closure time for the MSIV's. The MSIV's are provided to prevent the blowdown of more than one steam generator in the event of a main steam line break. The effects on the safety analysis of increasing response time to 8.0 seconds was evaluated in conjunction with approval of PCN-207 in Amendments 60 and 49 and were found to be acceptable. Because this proposed change merely corrects an editorial discrepancy, the proposed change does not result in an increase in the probability or consequences of a previously evaluated accident.

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 proposed change corrects an editorial discrepancy in the Technical Specifications, therefore it does not create the possibility of a new or different kind of accident from any previously evaluated.

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

Response: No

The proposed change corrects an editorial discrepancy and therefore does not affect any margin of safety.

The Commission has provided guidance for determining whether a significant hazards exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (i) relates to a purely administrative change; for example, a change to achieve consistency in the Technical Specifications, correction of an error, or a change in nomenclature. In this case, the proposed change increases the CIAS response time for MSIV's listed in Table 3.3-5 from 6.9 to 8.9 seconds, including instrumentation delay. This change makes the CIAS MSIV response time consistent with that listed under MSIS in Table 3.3-5 as well as

in Technical Specification 3/4.7.1.5 which lists the MSIV response time as 8.0 seconds, excluding instrumentation delay. Because this proposed change corrects an editorial discrepancy created by the issuance of Amendments 60 and 49, it is similar to Example (i).

Safety and Significant Hazards Determination

Based on the above Safety Analysis it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; and (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.

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