

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA)	Docket No. 50-361
EDISON COMPANY, <u>ET AL.</u> for a Class 103)	
License to Acquire, Possess, and Use)	
a Utilization Facility as Part of)	Amendment Application
Unit 2 of the San Onofre Nuclear)	No. 120
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 120.

This amendment application consists of proposed Technical Specification Change No. NPF-10-400 to Facility Operating License No. NPF-10. Proposed Technical Specification Change NPF-10-400 is a request to revise Surveillance Requirement 4.5.1.c, "Safety Injection Tanks (SITs)." This change will add an alternate method of ensuring power removal to the Safety Injection Tank vent valves. The existing method is to verify that the fuses are removed. The proposed alternate method is to verify that the disconnect switches are open.

Subscribed on this 29th day of OCTOBER, 1992.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By:

Harold B. Ray
Harold B. Ray
Senior Vice President

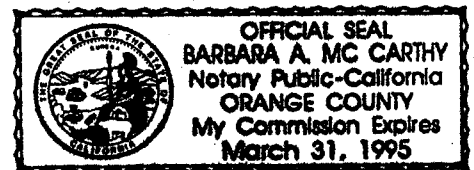
State of California

County of ORANGE ~~San Diego~~ *Bm*

On 10/29/92 before me, BARBARA A. MCCARTHY / NOTARY PUBLIC,
personally appeared HAROLD B. RAY, personally known to
me (~~or proved to me on the basis of satisfactory evidence~~) to be the
person(s) whose name(s) is/~~are~~ subscribed to the within instrument and
acknowledged to me that he/~~she/they~~ executed the same in his/~~her/their~~
authorized capacity(~~ies~~), and that by his/~~her/their~~ signature(s) on the
instrument the person(s), or the entity upon behalf of which the
person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature Barbara A. McCarthy



James A. Beoletto
Attorney for Southern
California Edison Company

By:

James A. Beoletto

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA)	Docket No. 50-362
EDISON COMPANY, <u>ET AL.</u> for a Class 103)	
License to Acquire, Possess, and Use)	
a Utilization Facility as Part of)	Amendment Application
Unit 3 of the San Onofre Nuclear)	No. 104
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 104.

This amendment application consists of proposed Technical Specification Change No. NPF-15-400 to Facility Operating License No. NPF-15. Proposed Technical Specification Change NPF-15-400 is a request to revise Surveillance Requirement 4.5.1.c, "Safety Injection Tanks (SITs)." This change will add an alternate method of ensuring power removal to the Safety Injection Tank vent valves. The existing method is to verify that the fuses are removed. The proposed alternate method is to verify that the disconnect switches are open.

Subscribed on this 29th day of October, 1992.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By:

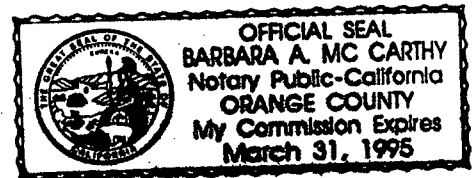
Harold B. Ray
Harold B. Ray
Senior Vice President

State of California

County of ~~San Diego~~ ORANGE

On 10/29/92 before me, BARBARA A. MCCARTHY/NOTARY PUBLIC
personally appeared HAROLD B. RAY, personally known to
me (~~or proved to me on the basis of satisfactory evidence~~) to be the
person(~~s~~) whose name(~~s~~) is/~~are~~ subscribed to the within instrument and
acknowledged to me that he/~~she~~/they executed the same in his/~~her~~/their
authorized capacity(~~ies~~), and that by his/~~her~~/their signature(~~s~~) on the
instrument the person(~~s~~), or the entity upon behalf of which the
person(~~s~~) acted, executed the instrument.

WITNESS my hand and official seal.



Signature

Barbara A. McCarthy

James A. Beoletto
Attorney for Southern
California Edison Company

By:

James A. Beoletto
James A. Beoletto

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF 10/15-400

This is a request to revise Technical Specification (TS) 4.5.1.c, "Safety Injection Tanks" by adding an alternate method of ensuring power is removed from the Safety Injection Tank vent valves.

Existing Specifications

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

Proposed Specifications

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

Description

The Safety Injection Tank (SIT) vent valves provide a means to vent the SITs when nitrogen cover pressure is higher than the limit of 655 psia stated in TS 3.5.1.d. When not in use, to maintain required cover pressure these valves must be maintained closed with power removed. Because these valves do not meet single failure criteria, there must be a "method of detection" that ensures power is removed. Surveillance Requirement (SR) 4.5.1.c, "Safety Injection Tanks (SITs)", requires verification every 31 days that the fuses are removed for each SIT vent valve. Removing the fuses has provided the means for power removal, and SR 4.5.1.c has provided the "method of detection."

This is a request to revise SR 4.5.1.c to provide flexibility in the method of power removal. The requested change will require verification every 31 days that either the disconnect switch for each SIT vent valve is in the open position or that the fuses are removed. The disconnect switches will be the method for removing power to the SIT vent valves whenever these switches are OPERABLE. Opening disconnect switches to remove power to the SIT vent valves will avoid wear on the fuses and the fuse holder due to repeated pulling and replacement whenever the SITs are vented. Also, the disconnect switch offers greater accessibility than the fuses. This is valuable because TS 3.5.1 provides only a one hour ACTION statement when a SIT is declared inoperable, which includes venting.

With this change, the option to remove power to the SIT vent valves by removing fuses is maintained and will be used if unforeseen difficulties cause the switches to become INOPERABLE at any time.

Discussion

Currently, to vent a SIT the associated vent valve fuse must be replaced in its fuse holder and the associated disconnect switch must be thrown to the closed position. These two actions provide power to the valve, which may then be opened by the operator. TS 4.5.1.c requires the fuses to be removed at all times when the SIT vent valves are to be closed. Providing power to a vent valve to operate it renders the SIT INOPERABLE. There are no existing requirements for the disconnect switches. However, the disconnect switches are maintained in the open position at all times when the SIT valves are to be closed.

The disconnect switches for the SITs are of the double-pole, single-throw variety. In the fully open position the switch hangs downward at a 180 degree angle from the closed position. The switch must be thrown upward to the closed position. Therefore, positive operator action is required to close the switches. SCE has also performed calculations to ensure that the switches will not fail closed from the open position during a Design Basis Earthquake. These calculations assume that the switches are initially open at least 90 degrees.

Currently, the removed fuses are placed in an unlocked drawer. The fuses are replaced in the fuse holder in accordance with procedures only when the SIT vent valves are to be open. The disconnect switches are in an unlocked cabinet that is normally closed. There are several other components besides the disconnect switches located in this cabinet. None of the components in this cabinet are operated unless called for by a site procedure. These procedures identify by tag number the equipment to be operated. The disconnect switches are clearly labeled so there is no possibility of inadvertent closure. Therefore, there is no change in the level of administrative control on the vent valves.

When this change is approved, the surveillance procedure will be revised to reflect that either the disconnect switch must be verified to be in the open position or the vent valve fuses must be removed from the fuse holder. The acceptance criteria for the disconnect switches will reflect the assumptions of the seismic qualification calculations. The current calculations assume the switches are at least 90 degrees open, therefore the acceptance criteria will be at least 90 degrees open.

Also, the relevant normal and emergency operating instructions will be revised to reflect that the SIT vent valve fuses will be maintained in the fuse holder at all times unless the associated disconnect switches are INOPERABLE. In this case the fuse will be removed from the fuse holder to provide the method of power removal from the SIT vent valves.

Safety Analysis

The proposed change described 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 SIT vent valves will still be maintained with power removed when the valves are closed and with a method of detection of power removal. This change only provides an alternate method of ensuring power is removed from these valves. The SIT vent valve fuses will remain in the fuse holder at all times unless the associated disconnect switch is INOPERABLE, and the monthly surveillance will normally be performed on the disconnect switches instead. Procedures will be changed to reflect the new surveillance, method of removing power, and operation of the vent valves. There is no change to the SIT vent valve configuration. Therefore, there is no

significant 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 type of accident from any accident previously evaluated?

Response: No

The SIT vent valves will still be maintained with power removed when the valves are closed and with a method of detection of power removal. This change only provides an alternate method of ensuring power is removed from these valves. The SIT vent valve fuses will remain in the fuse holder at all times unless the associated disconnect switch is INOPERABLE, and the monthly surveillance will normally be performed on the disconnect switches instead. Procedures will be changed to reflect the new surveillance, method of removing power, and operation of the vent valves. There is no change to the SIT vent valve configuration. Therefore, there is no possibility of a different type 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 SIT vent valves will still be maintained with power removed when the valves are closed and with a method of detection of power removal. This change only provides an alternate method of ensuring power is removed from these valves. The SIT vent valve fuses will remain in the fuse holder at all times unless the associated disconnect switch is INOPERABLE, and the monthly surveillance will normally be performed on the disconnect switches instead. Procedures will be changed to reflect the new surveillance, method of removing power, and operation of the vent valves. There is no change to the SIT vent valve configuration. Therefore, there is no significant reduction of a margin of safety.

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; 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.