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SUBJECT: Requests that proposed Tech Spec Changes NPF-10/15-15 & NPF-10/15-127 receive degree of consideration comparable to that given Tech Spec changes required for refueling, since approval could significant benefit refueling outage.

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September 12, 1984

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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

The Southern California Edison Company (SCE) has recently submitted a number of proposed changes to the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 Technical Specifications which are required for Unit 2 refueling and, therefore, necessitate expeditious review and approval. In addition, SCE has submitted several other Technical Specification change requests which are not directly related to the Unit 2 refueling. Approval of two of these changes, Proposed Change Numbers NPF-10/15-15 and NPF-10/15-127, although not required to support the outage, could significantly benefit the refueling outage by facilitating surveillance testing and Shutdown Cooling System (SDCS) modification, which are to be accomplished during this outage. Therefore, SCE requests that Proposed Change Numbers NPF-10/15-15 and NPF-10/15-127 receive a comparable degree of consideration. Timely approval of two other previously submitted proposed changes, NPF-10/15-135 and NPF-10/15-138, also would significantly benefit continued operation of SONGS 2 and 3.

Proposed Change Number NPF-10/15-15 concerns the Reactor Coolant System (RCS) when the plant is in cold shutdown (Mode 5) with the RCS loops filled. The proposed change would allow both trains of the SDCS to be taken out of service. The SDCS will be modified when the plant is defueled. If any problems affecting both SDCS trains are encountered subsequent to refueling (Mode 6) and return to Mode 5, the Technical Specifications currently would require return to Mode 6 and defueling before any repairs could be made. The proposed change would allow both SDCS trains to be removed from service and repaired in Mode 5, if necessary. This proposed change was originally submitted to the Nuclear Regulatory Commission (NRC) on September 3, 1982 for Unit 2 and on January 25, 1983 for Unit 3 and was subsequently prenoticed in the Federal Register on February 24, 1984 for Unit 2 and on July 20, 1984 for Unit 3.

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Proposed Change Number NPF-10/15-127 concerns the Emergency Chilled Water System (ECWS). The ECWS is a support system which provides space cooling for Engineered Safety Features (ESF) equipment requiring post accident operability. As such, on receipt of an ESF signal, the emergency chillers are required to actuate and be sequentially loaded with the other ESF loads onto the diesel generators. This function is in part tested by the Integrated ESF Test required by Technical Specification 4.8.1.1.2.d.7 which is to be performed during the refueling outage. The ECWS is shared by Units 2 and 3 and can be aligned to either unit to receive power and component cooling water. Performance of the Integrated ESF Test necessitates realignment to Unit 2 of the busses which power the ECWS. These busses are currently aligned to Unit 3. The Technical Specifications currently require both Units 2 and 3 to be in cold shutdown (Mode 5) in order to transfer the emergency chillers from one unit to the other. Proposed Change Number NPF-10/15-127 would allow transfer of the chillers between Units 2 and 3 while the units are operating and, therefore, would facilitate performance of the Unit 2 Integrated ESF Test, since Unit 3 would no longer be required to be shutdown to allow emergency chiller realignment to Unit 2. The Integrated ESF Test is scheduled to be conducted immediately after entry into Mode 5 during the refueling outage. This proposed change was originally submitted to the NRC on April 24, 1984 for both Units 2 and 3. Additional information was provided for both Units 2 and 3 by SCE letter dated August 7, 1984.

Proposed Change NPF-10/15-135 concerns the Toxic Gas Isolation System (TGIS). The TGIS is an Engineered Safety Feature (ESF) designed to preserve control room habitability by detecting the presence of toxic gases and isolating the control room in the event of a toxic gas release near the plant. As an ESF, all actuations of the TGIS are reportable in accordance with 10 CFR 50.73. Many spurious actuations have occurred and are continuing to occur frequently, in part due to the very conservative TGIS instrument setpoints currently in the Technical Specifications. Proposed Changes NPF-10/15-135 would increase these setpoints, thereby reducing the number of spurious actuations. This change was originally submitted on April 6, 1984.

Proposed Change NPF-10/15-138 would revise technical specifications relating to control element assembly (CEA) position and insertion limits to allow the implementation of Core Protection Calculator (CPC) and Control Element Assembly Calculator (CEAC) software changes. The software changes would reduce CEAC sensitivity to spurious CEA inward deviations, thereby eliminating unnecessary plant trips. In addition to this operational benefit, this proposed change is part of the groundrules for SONGS 2 and 3, Cycle 2 and, as such, must be approved prior to restart following Unit 2 refueling. Proposed Change NPF-10/15-138 was originally submitted April 10, 1984. Additional information requested by the staff to enable completion of its review was provided by SCE's letters dated August 1 and August 7, 1984.

Accordingly, SCE requests that review and approval of Proposed Change Numbers NPF-10/15-15 and NPF-10/15-127 be completed prior to Unit 2 return to Mode 5, which is currently scheduled to occur on December 26, 1984.

Mr. G. W. Knighton

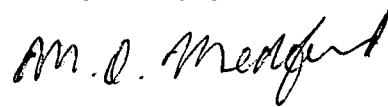
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September 12, 1984

In addition, because of the operational benefits to be gained by approval of Proposed Changes NPF-10/15-135 and 138, as noted above, SCE requests that review and approval of these changes be completed as soon as possible.

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

Very truly yours,

A handwritten signature in dark ink, appearing to read "M. D. Medford". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

cc: Harry Rood, NRC (to be opened by addressee only)
Joseph O. Ward, California Department of Health Services
A. E. Chaffee, NRC Resident Inspector