BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. for a Class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 2 of the San Onofre Nuclear Generating Station	)	DOCKET NO. 50-361 Amendment Application No. NPF-10-2

SOUTHERN CALIFORNA EDISON COMPANY, ET AL., pursuant to 10 CFR 50.90, hereby submit Amendment Application No. NPF-10-2.

This amendment consists of Proposed Change No. 6 to Facility Operating License No. NPF-10. Proposed Change No. 6 is a request for revision of Technical Specification 4.8.4.1.a.2. The proposed change is a request to eliminate the Trip Setpoint (amperes) and Response Time (sec) requirements from Table 3.8-1, Containment Penetration Conductor Overcurrent Protective Devices. The proposed change has no effect on the manner in which the protective devices will be tested and no physical changes are required to the plant.

The amendment is an administrative change to clarify the surveillance requirements for overcurrent protective devices. Accordingly, it is concluded that (1) the proposed change does not involve an unreviewed safety question as defined in 10 CFR 50.59, nor does it present significant hazard considerations not described or implicit in the Final Safety Analysis; (2) there is a 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.

Pursuant to 10 CFR 170.22, Proposed Change No. 6, submitted as Amendment Application No. NPF-10-2, is determined to be a Class II change. The basis for this determination is that the change is administrative in nature and has no safety or environmental significance.

Accordingly, the fee of $1,200.00 corresponding to this determination is remitted herewith as required by 10 CFR 170.22.

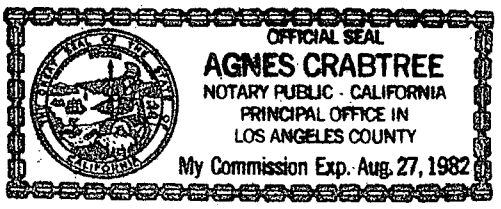
Subscribed on this 14th day of April 1982.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By Robert Dietch

Subscribed and sworn to before me this
14th day of April 1982.



Agnes Crabtree
Notary Public in and for the County of
Los Angeles, State of California

My Commission Expires: Aug 27, 1982

Subscribed on this 15 day of April 1982.

Respectfully submitted,

SAN DIEGO GAS & ELECTRIC COMPANY

By L D Colton

Subscribed and sworn to before me this

15 day of April 1982.

Anne R. Schmidt

Notary Public in and for the County of
San Diego, State of California

My Commission Expires: 10/11/83

OFFICIAL SEAL
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My Commission Exp. Oct. 11, 1983

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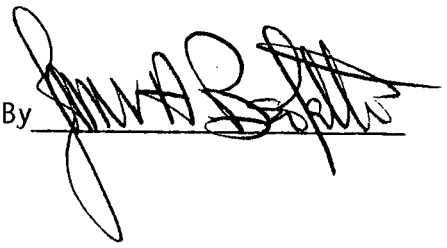
By 

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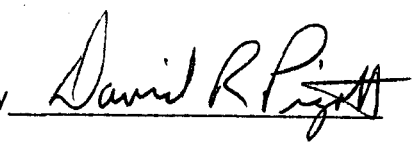
By 

DESCRIPTION OF AMENDMENT APPLICATION AND SAFETY ANALYSIS
AMENDMENT APPLICATION NO. NPF-10-2 OPERATING LICENSING NPF-10

This is a request to revise Appendix "A" Technical Specification 4.8.4.1.

CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES

Existing Specification

See Attachment "A"

Proposed Specification

See Attachment "B"

Reason for Proposed Change

Technical Specifications 4.8.4.1.a.2 requires in part, (a) "For the lower voltage circuit breakers the nominal trip setpoint and short circuit response times are listed in Table 3.8-1," and (b) "Testing of these circuit breakers shall consist of injecting a current in excess of the breakers' nominal setpoint and measuring the response time. The measured response time will be compared to the manufacturer's data to insure that it is less than or equal to a value specified by the manufacturer."

We are proposing to delete the data of part (a) of the Technical Specification above for the reasons discussed below. In the future, this data will be listed in the appropriate station procedures.

Circuit breakers are designed by the manufacturer to respond to an overcurrent condition with an inverse time delay trip; i.e., the larger the overcurrent, the sooner the trip occurs after the overcurrent starts.

Lower voltage circuit breakers are normally "molded case" type breakers with a thermal type trip element. While designed to protect circuits from short circuit conditions, these breakers are not designed to be repeatedly tested at short circuit conditions. They are, however, designed to be tested at some nominal value above the lowest trip setpoint but below the short circuit trip setpoint and will normally respond in accordance with the manufacturer's response time curve.

Therefore, if the breakers are tested at or above this nominal value and they also respond in accordance with the manufacturer's specifications, they properly are considered OPERABLE per the Technical Specifications part "b" above.

The requirement to list nominal trip values which are not necessarily used for testing and to list short circuit response times which are not used at all is of little value. We propose that Specification 4.8.4.1.a.2, sentence three, be deleted, and that the trip values and response times be deleted from Table 3.8-1. We further propose that Technical Specifcation 4.8.4.1.a.1.b be similarly modified as marked for consistency with 4.8.4.1.a.2.

Safety Analysis

This amendment application clarifies the required method of testing the Containment Penetration Conductor Overcurrent Protective Devices but does not alter the intent of the Technical Specification nor does this clarification require any alteration of the physical station.

Accordingly, it is concluded that: (1) the amendment application does not involve an unreviewed safety question as defined in 10 CFR 50.59, nor does it present significant hazard considerations not described or implicit in the Final Safety Analysis; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the amendment; 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.

LP:3907