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SUBJECT: Forwards proposed change NPF-10-10 to Tech Specs 3.3.2,
 Table 3.3-5, page 3/4 3-29. Proposed change enables auxiliary
 feedwater pump load sequence delay to EFAS response time to
 be consistent w/design basis requirements.

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May 19, 1982

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Director, Office of Nuclear Reactor Regulation
Attention: Mr. Frank Miraglia, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-361
San Onofre Nuclear Generating Station
Unit 2

Amendment Application No. 3 to Facility Operating License NPF-10 for San Onofre Nuclear Generating Station, Unit 2, was formally submitted to the NRC on May 14, 1982. Amendment Application No. 3, required prior to the issuance of the 5% power license, consisted of six (6) proposed changes to Technical Specifications incorporated in Facility Operating License NPF-10 as Appendix A and one (1) proposed change to Section 2.C(5)c of Facility Operating License NPF-10.

Enclosed you will find proposed change NPF-10-10, which was formally submitted as part of Amendment Application No. 3. Changes to Technical Specification 3.3.2, Table 3.3-5 and Technical Specification 3.3.3.6, Table 3.3-10 are contained in NPF-10-10. It is requested that you please consider these changes to be of emergency status and direct your attention to it as soon as possible. Proposed change to Technical Specification 3.3.2, Table 3.3-5, page 3/4 3-29 enables the AFW pump load sequence delay to EFAS response time to be consistent with the design basis requirements. The Technical Specification, as currently written, declares the Safety Feature Actuation System to be inoperable and plant shutdown required in Mode 3. Technical Specification 3.3.3.6, Table 3.3-10, page 3/4 3-53, incorrectly identifies 2 cold leg HPSI flow channels. However, the plant has 4 cold legs and one HPSI flow channel per cold leg. This Technical Specification, as currently written, is unacceptable for it limits Mode 3 operation to 7 days. It is desirable to alleviate this restriction.

If you have any questions or if I can be of any assistance to you concerning the enclosed information, please contact me.

Very truly yours,

M. D. Meeford for KPB

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Enclosures

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DESCRIPTION OF PROPOSED CHANGE NPF-10-10 AND SAFETY ANALYSIS
AMENDMENT APPLICATION NO. 3 OPERATING LICENSE NPF-10

This is a request to make various editorial and typographical changes and resolve several inconsistencies in Appendix "A" Technical Specifications.

Existing Specifications

See Attachment "A"

Proposed Specifications

The proposed specifications are as follows and contained in Attachment "B" if noted:

Page

- 3/4 1-12 Technical Specifications 3.1.2.7.b.3 and 3.1.2.8.b.3 should be in
and conformance with Tech. Spec. 3.5.4.c and therefore the upper
3/4 1-14 temperature limit should be changed from 120°F to 100°F.
Consistent with this reasoning, Surveillance Requirement 4.1.2.7.b
and 4.1.2.8.b should read "outside air temperature is less than
40°F or greater than 100°F." to be in conformance with
Surveillance Requirement 4.5.4.b. The more restrictive value of
100°F should be reflected in the Technical Specifications.
- 3/4 1-25 Technical Specification 3.1.3.7, contained in Attachment "B", is
rewritten to allow the part length CEA group to be withdrawn to \geq
145" and left full out without the necessity of withdrawing the part
length CEA group to the upper electrical limit. This change will
permit Specification 3.1.3.7 to be in conformance with
Specifications 3.1.3.4 and 3.1.3.5 which defines fully withdrawn as
 \geq 145.
- 3/4 3-4 Technical Specification 3.3.1, Table 3.3-1, notation (c) should read
"bypass shall be automatically removed when THERMAL POWER is greater
than or equal to 5% of RATED THERMAL POWER" not 1%, to be consistent
with the actual operation of the bistable. Table 3.3-1 ACTION 2
Line 7 reads, "Specification 6.5.1.6k" and should read "6.5.1.6e"
because parts of Section 6.5.1.6 were deleted and item "k" was
relettered as item "e".
- 3/4 3-14 Technical Specification 3.3.2, Table 3.3-3 item 2, Containment Spray
(CSAS) is required to be operable in Modes 1, 2, and 3 but not
Mode 4 as defined in Technical Specification 3.6.2.1. The
requirement of Mode 4 should therefore be deleted.

Page

- 3/4 3-15 Technical Specification 3.3.2, Table 3.3-3 Item 5 is inconsistent with the implied operability requirement Technical Specification 3.5.3 which recognizes the additional applicable Mode 4. Therefore, Mode 4 should be added to Item 5 Table 3.3-3 under Applicable Modes.
- 3/4 3-19 Technical Specification 3.3.2, Table 3.3-3 notation "a" should state "bypass shall be automatically removed when pressurizer pressure is greater than or equal to 400 psia", not 500 psia. This change will be consistent with FSAR Section 7.2.1.1.6 and Technical Specification 3.3.1, Table 3.3-1 notation "b".
- 3/4 3-22 Technical Specification 3.3.2, Table 3.3-4 Item 5a Manual (RAS) should be deleted. There are no manual RAS (Trip Buttons) in the plant and therefore should be deleted. Reletter Item 5 as applicable.
- 3/4 3-29 and 3/4 3-30 Technical Specification 3.3.2, Table 3.3-5 Items 8 and 9 Auxiliary Feedwater (AC trains), change the response time on both items from "40.9*" to "50.9*/40.9**". The 40.9 second requirement pertains to non-LOCA events which include EDG starting in SIAS and pump load sequence delay. Such events are bounded for AFW delivery time by the loss of normal feedwater event and require AFW delivery in 42.7 seconds (40.9 is conservative). Events which require AFW when SIAS is present (e.g., small break LOCA) are bounded for AFW delivery time by the (coincident) loss of normal A/C event and require AFW delivery in 53 seconds (50.9 is conservative). This change therefore makes the applicability of AFW pump load sequence delay to EFAS response time consistent with design basis requirements. Due to this change the following will need to be added to the bottom of page 3/4 3-30 "** Emergency diesel generator starting delay (10 seconds) is included".
- 3/4 3-53 Technical Specification 3.3.3.6, Table 3.3-10, change item 23 Cold Leg HPSI Flow from 2/cold leg to 1/cold leg for the required number of channels and 1/cold leg to N.A. under minimum channels operable. The plant has 4 cold legs and one HPSI flow channel per cold leg. The proposed change is contained in Attachment "B".
- 3/4 4-3 Technical Specification 3.4.1.3 specifies:
- #With the Reactor Coolant System cold leg temperature less than or equal to 235°F, the SDCS isolation valves HV-9337, HV-9339, HV-9377, and HV-9378 shall be open with the SDCS relief valve PSV-9349 OPERABLE.

Surveillance Requirement 4.4.8.3.1.1.a (Page 3/4 4-32) specifies:

- a. Verifying at least once per 72 hours when the SDCS Relief Valve is being used for overpressure protection that at least one pair of SDCS Relief Valve isolation valves (valve pair 2HV9337 and 2HV9339 or valve pair 2HV9377 and 2HV9378) is open.

The statement in Spec. 3.4.1.3 is a SURVEILLANCE REQUIREMENT contained in an APPLICABILITY statement. This is inconsistent and redundant to Surveillance Requirement of 4.4.8.3.1.1.a and should be deleted.

- 3/4 4-5 Technical Specification 3.4.1.4.1, should be rewritten as "At least one shutdown cooling train shall be OPERABLE and in operation* either:" The mention of suction line valves to be opened should be deleted from the first two lines. These valves are controlled by the low temperature overpressure protection Technical Specification 3.4.8.3.1, ACTION item "b" which allows some of the SDCS valves to be closed at times.
- 3/4 4-8 Technical Specifications 4.4.3.2 should have the words "from the 1E busses." added to the end of the sentence. This added information is for clarification as required by SER II.E.3.1.
- 3/4 4-32 Technical Specification 3.4.8.3.1 APPLICABILITY needs changed from "one any" to "any one".
- 3/4 7-9 Technical Specification 3.7.1.5, Modes 2 and 3, The word "in" was inadvertently omitted. It should read "Otherwise, be in at least HOT STANDBY within the next 6 hours...."
- 3/4 10-6 Technical Specification 3.10.5, Table 3.10-1, item 2.a Main Steam Line Area Monitor "2RT-7847B1" should be "2RT-7874B1".
- 3/4 10-8 Technical Specification 3.10.6, line 1, the word "of" is misspelled as "fo" and requires correction.
- B 3/4 7-7 Fire Suppression Systems, insert new paragraph.

"The San Onofre Unit 2&3 fire pumps and water supplies, supply water to the San Onofre Unit 1 fire system. Satisfactory completion of the Unit 2&3 fire pump and water supply surveillance requirements, automatically satisfies the Unit 1 fire water supply requirements." This will clarify the relationship between the two fire systems.

B 3/4 8-2 Surveillance Requirement 4.8.1.1.2.c requires obtaining fuel oil samples in accordance with ASTM-D270-1975. As indicated in Part 23 of the ASTM manual, the appropriate standard for obtaining these samples is ASTM-D270-1965 (Reverified 1975). However Reg. Guide 1.137 paragraph C.2.c specifically calls for ASTM-D270-1975. Therefore, for clarity the following should be added to the end of the second paragraph of the BASES, page B 3/4 8-2: "Reg. Guide 1.137 recommends testing of fuel oil samples in accordance with ASTM-D270-1975 however ASTM-D270-1965 was reverified in 1975 and is therefore the appropriate standard to be used".

Reason for Proposed Change

The various corrections contained in this proposed change are for clarification only.

Safety Analysis

Corrections contained in this Proposed Change NPF-10-10 are editorial or typographical and do not change the intent of the Technical Specifications.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-10 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 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.

HP:4082

NPF-10-10

ATTACHMENT A