

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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SUBJECT: Application for proposed Tech Spec change re fire detection instrumentation min instruments operable to facilitate replacement of ultraviolet flam detectors inside containment.

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K. P. BASKIN
MANAGER OF NUCLEAR ENGINEERING,
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July 9, 1982

TELEPHONE
(213) 572-1401

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

Enclosed for your review and approval is a copy of a proposed change to Technical Specification 3.3.3.7, Table 3.3-11, FIRE DETECTION INSTRUMENTATION MINIMUM INSTRUMENTS OPERABLE.

NRC approval of the proposed change is requested to facilitate the replacement of Ultraviolet (UV) flame detectors inside containment with ionization type smoke detectors, prior to initial criticality which could occur as early as July 20, 1982. The UV detectors are susceptible to the expected radiation levels and will alarm after initial criticality. Because this design change involves a change in the Technical Specifications, NRC prior approval is required in accordance with 10 CFR 50.59.

The proposed change is also required to facilitate the conversion of charcoal filter deluge systems from automatic to manual actuation by moving the charcoal filter heat detectors from the actuation to the early warning column. Installation of automatic charcoal filter deluge systems was the option initially selected by SCE to satisfy the requirements of Regulatory Guide 1.52 to prevent auto-ignition of charcoal filters by decay heat from adsorbed activity. During the startup program, the project has experienced difficulties in the form of spurious actuation of the automatic system. The solution to this problem is to convert the automatic system to a manually actuated system. In the automatic system, an early warning alarm would occur prior to actuation of the deluge system at higher temperatures. In the manual system, the early warning alarm would result in dispatch of the fire brigade to actuate the deluge system if required. Because of the slow burning nature of charcoal filter fires, manual actuation would occur at approximately the same time after the early warning alarm as automatic actuation. As a result, the difference between automatic and manual actuation is insignificant. However, charcoal filter availability is significantly increased by elimination of the possibility of spurious actuation associated with the automatic system.

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Mr. Frank Miraglia

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July 9, 1982

Timely NRC approval of the proposed change is requested so that the UV detectors discussed above can be replaced prior to initial criticality. A formal request for an amendment to Operating License NPF-10 which details this proposed change will be forwarded to the NRC during the week of July 12, 1982. The formal request will include a check in the amount of \$1,200.00 for this change which has been determined to be a Class II change in accordance with 10 CFR 170.22.

If you have any questions concerning this change, please call me.

Very truly yours,

M. D. Manfredi
for KPB

Enclosure

DESCRIPTION OF PROPOSED CHANGE NPF-10-24 AND SAFETY ANALYSIS
AMENDMENT APPLICATION NO. 7 OPERATING LICENSE NPF-10

This is a request to revise Technical Specification 3.3.3.7, Table 3.3-11, FIRE DETECTION INSTRUMENTS MINIMUM INSTRUMENTS OPERABLE.

Existing Specification

See Attachment "A"

Proposed Specification

See Attachment "B"

Reason for Proposed Changes

Technical Specification 3.3.3.7, Table 3.3-11

Zone 1 The 14 flame detectors listed in the cable tray areas are ultraviolet (UV) detectors and may not operate in the expected radiation environment. The proposed change is required to reflect the replacement of the 14 UV detectors by 23 ionization smoke detectors which will operate in the expected radiation environment and provide equivalent fire detection capability.

The single smoke detector listed in the 63'3" elevation cable tray area is actually located in the Elevator Machinery Room as is reflected by the proposed change.

Thirty-two UV flame detectors provided for early warning in the combustible oil area (Reactor Coolant Pump Area) were inadvertently listed as smoke detectors in the actuation column. The UV detectors will not operate in the expected radiation environment. The reactor coolant pump oil collection system in combination with a heat actuated deluge-water spray system provides adequate fire protection without the UV flame detectors. The proposed change reflects the removal of the 32 UV detectors located in the combustible oil area.

The two heat detectors listed in the actuation column for the charcoal filter area are moved to early warning column to facilitate conversion of the charcoal filter deluge-water spray system from automatic to manual operation.

Zone 9 The heat detectors listed in the actuation column for Emergency AC Units in Rooms 301 and 309 are moved to the early warning column to facilitate conversion of the charcoal filter deluge-water spray systems from automatic to manual operation.

Safety Analysis of Proposed Change

Fire detection instrumentation ensures that adequate warning capability is available for the prompt detection of fires. This capability is required to detect and locate fires in their early stages, thus reducing the potential for damage to safety related equipment. Replacement of the UV detectors in the cable tray areas of containment with 23 ionization smoke detectors results in no reduction of fire detection capability. The reactor coolant pump oil collection system in combination with heat detectors and a deluge-water spray system provides adequate fire protection without UV detectors in the combustible oil area of containment.

Conversion of the charcoal filter deluge-water spray systems from automatic to manual operation provides adequate fire protection and enhances the availability of the charcoal filters by reducing the probability of spurious dousing of the charcoal. Because of the slow burning nature of charcoal fires, additional damage resulting from the time delay associated with manual actuation is insignificant when compared with the potential damage resulting from spurious dousing of the charcoal filter by the automatically actuated system.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-24 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.

PS:4791