

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON	)	
COMPANY, <u>ET AL.</u> for a Class 103 License to	)	DOCKET NO. 50-361
Acquire, Possess, and Use a Utilization	)	
Facility as Part of Unit No. 2 of the San	)	Amendment Application
Onofre Nuclear Generating Station	)	No. 36

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90,  
hereby submit Amendment Application No. 36.

This amendment application consists of the following proposed  
changes to Facility Operating License No. NPF-10:

1. Proposed Change NPF-10-197 is a request to revise Technical Specifications 3/4.1.3.6, "Regulating CEA Insertion Limits," 3/4.1.3.7, "Part Length CEA Insertion Limits," and 3/4.10.2, "Group Height, Insertion and Power Distribution Limits" as well as Bases 3/4.1.3, "Movable Control Assemblies." The proposed changes would provide a better and more realistic interpretation of the Technical Specification intent by clearly addressing the allowable duration of both full length and part length CEA insertion limits and by clarifying the extreme limits of CEA travel.
2. Proposed Change NPF-10-223 is a request to revise Technical Specification 3/4.3.3.8, "Radioactive Liquid Effluent Monitoring Instrumentation." The proposed change would delete Action 30 and apply Action 29 to the turbine building sumps effluent line monitor

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with incorporation of a revised sampling frequency to monitor the specific activity of the secondary coolant. This proposed change was previously submitted by SCE's letter dated November 26, 1986.

3. Proposed Change NPF-10-225 is a request to revise Technical Specifications 3/4.11.2, "Gaseous Effluents," 3/4.11.1.3, "Liquid Waste Treatment," and 3/4.11.2.4, "Gaseous Radwaste Treatment." The proposed change would revise the sampling and analysis frequency of radiiodines and principal gamma emitters in particulate form in gaseous effluents. It would also redefine the operability surveillance requirements for the liquid radwaste treatment system, ventilation exhaust treatment system, and gaseous radwaste treatment system.
4. Proposed Change NPF-10-226 is a request to revise License Conditions 2.C(14) for Unit 2 and 2.C(12) for Unit 3 concerning "Fire Protection" and 2.G for both units regarding a reporting requirement for any violations of Item C(1), C(3) through C(22), E, and F in Section 2. It is also a request to delete Technical Specifications 3/4.3.3.7, "Fire Detection Instrumentation;" 3/4.7.8, "Fire Suppression Systems;" 3/4.7.9, "Fire Rated Assemblies" and 6.2.2.e, "Unit Staff-Fire Brigade." The proposed changes would allow future changes to of the fire protection program to be made without prior NRC approval under the authority of 10 CFR 50.59. This proposed change was previously submitted by SCE's letter dated February 2, 1987.

Pursuant to 10 CFR 170.12, an amendment application fee of \$150.00 is required for each license amendment request. Accordingly, the Southern California Edison Company's check for \$150.00 is enclosed.

SPW:8000F

Subscribed on this 7<sup>th</sup> day of May 1987

Respectfully submitted,

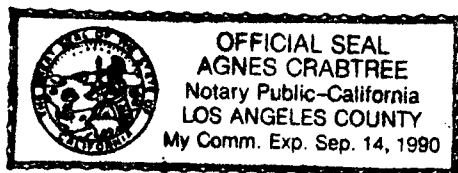
SOUTHERN CALIFORNIA EDISON COMPANY

By Winthrop P. Beoletto

Subscribed and sworn to before me this  
7<sup>th</sup> day of May 1987.

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

My Commission Expires: Sep. 14, 1990



Charles R. Kocher  
James A. Beoletto  
Attorneys for Southern  
California Edison Company

By James A. Beoletto

SAN DIEGO GAS & ELECTRIC COMPANY

By

J. C. Adkome

David R. Pigott  
Samuel B. Casey  
Orrick, Herrington & Sutcliffe  
Attorneys for San Diego  
Gas & Electric Company

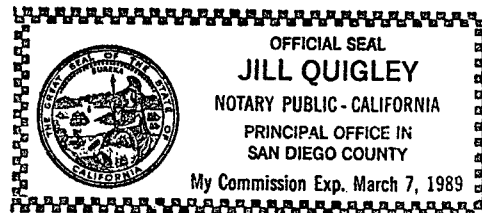
By

David R. Pigott

Subscribed and sworn to before me this

26<sup>th</sup> day of March, 1987.

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



THE CITY OF ANAHEIM

By

*London W. Hart*

Alan R. Watts  
Rourke & Woodruff  
Attorney for the City of Anaheim

By

*Alan R. Watts*

Subscribed and sworn to before me  
this 18th day of March, 1987

*Cathy Karpow*

Notary Public in and for the County  
of Orange, State of California



THE CITY OF RIVERSIDE

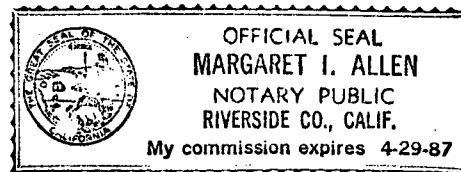
By Bud L

Alan R. Watts  
Rourke & Woodruff  
Attorney for the City of Riverside

By Alan R Watts

Subscribed and sworn to before me  
this 19th day of March, 1987.

Margaret I. Allen  
Notary Public in and for the County  
of Riverside, State of California



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON	)	
COMPANY, <u>ET AL.</u> for a Class 103 License to	)	DOCKET NO. 50-362
Acquire, Possess, and Use a Utilization	)	
Facility as Part of Unit No. 3 of the San	)	Amendment Application
Onofre Nuclear Generating Station	)	No. 22

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90,  
hereby submit Amendment Application No. 22.

This amendment application consists of the following proposed  
changes to Facility Operating License No. NPF-15:

1. Proposed Change NPF-15-197 is a request to revise Technical Specifications 3/4.1.3.6, "Regulating CEA Insertion Limits," 3/4.1.3.7, "Part Length CEA Insertion Limits," and 3/4.10.2, "Group Height, Insertion and Power Distribution Limits" as well as Bases 3/4.1.3, "Movable Control Assemblies." The proposed changes would provide a better and more realistic interpretation of the Technical Specification intent by clearly addressing the allowable duration of both full length and part length CEA insertion limits and by clarifying the extreme limits of CEA travel.
  
2. Proposed Change NPF-15-223 is a request to revise Technical Specification 3/4.3.3.8, "Radioactive Liquid Effluent Monitoring Instrumentation." The proposed change would delete Action 30 and apply Action 29 to the turbine building sumps effluent line monitor

with incorporation of a revised sampling frequency to monitor the specific activity of the secondary coolant. This proposed change was previously submitted by SCE's letter dated November 26, 1986.

3. Proposed Change NPF-15-225 is a request to revise Technical Specifications 3/4.11.2, "Gaseous Effluents," 3/4.11.1.3, "Liquid Waste Treatment," and 3/4.11.2.4, "Gaseous Radwaste Treatment." The proposed change would revise the sampling and analysis frequency of radioiodines and principal gamma emitters in particulate form in gaseous effluents. It would also redefine the operability surveillance requirements for the liquid radwaste treatment system, ventilation exhaust treatment system, and gaseous radwaste treatment system.
4. Proposed Change NPF-15-226 is a request to revise License Conditions 2.C(14) for Unit 2 and 2.C(12) for Unit 3 concerning "Fire Protection" and 2.G for both units regarding a reporting requirement for any violations of Item C(1), C(3) through C(22), E, and F in Section 2. It is also a request to delete Technical Specifications 3/4.3.3.7, "Fire Detection Instrumentation;" 3/4.7.8, "Fire Suppression Systems;" 3/4.7.9, "Fire Rated Assemblies" and 6.2.2.e, "Unit Staff-Fire Brigade." The proposed changes would allow future changes to the fire protection program to be made without prior NRC approval under the authority of 10 CFR 50.59. This proposed change was previously submitted by SCE's letter dated February 2, 1987.

Pursuant to 10 CFR 170.12, an amendment application fee of \$150.00 is required for each license amendment request. Accordingly, the Southern California Edison Company's check for \$150.00 is enclosed.

SPW:8001F

Subscribed on this 7th day of May, 1987

Respectfully submitted,

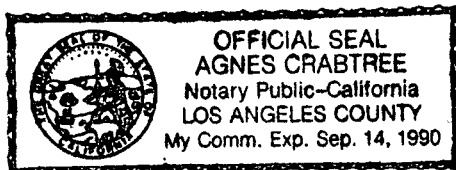
SOUTHERN CALIFORNIA EDISON COMPANY

By Kenneth P. Baskin

Subscribed and sworn to before me this  
7th day of May 1987.

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

My Commission Expires: Sep. 14, 1990



Charles R. Kocher  
James A. Beoletto  
Attorneys for Southern  
California Edison Company

By James A. Beoletto

SAN DIEGO GAS & ELECTRIC COMPANY

By

J. O'Halloran

David R. Pigott  
Samuel B. Casey  
Orrick, Herrington & Sutcliffe  
Attorneys for San Diego  
Gas & Electric Company

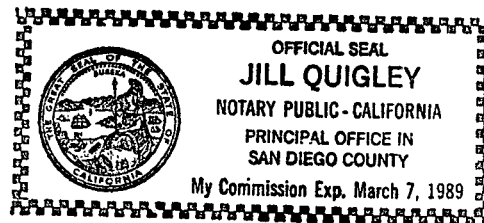
By

David R. Pigott

Subscribed and sworn to before me this

26<sup>th</sup> day of March, 1987.

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



THE CITY OF ANAHEIM

By

*Jonathan W. Hay*

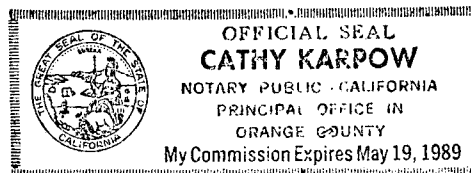
Alan R. Watts  
Rourke & Woodruff  
Attorney for the City of Anaheim

By

*Alan R. Watts*

Subscribed and sworn to before me  
this 18th day of March, 1987

*Cathy Karpow*  
Notary Public in and for the County  
of Orange, State of California



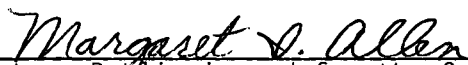
THE CITY OF RIVERSIDE

By 

Alan R. Watts  
Rourke & Woodruff  
Attorney for the City of Riverside

By 

Subscribed and sworn to before me  
this 19th day of March, 1987.

  
Notary Public in and for the County  
of Riverside, State of California



DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NPF-10/15-197, REV. 1

This is a request to revise Technical Specification 3/4.1.3.6, "Regulating CEA Insertion Limits," Technical Specification 3/4.1.3.7, "Part Length CEA Insertion Limits," Bases 3/4.1.3, "Movable Control Assemblies," and Technical Specification 3/4.10.2, "Group Height, Insertion and Power Distribution Limits."

Existing Technical Specifications:

Unit 2: See Attachment A  
Unit 3: See Attachment C

Proposed Technical Specifications:

Unit 2: See Attachment B  
Unit 3: See Attachment D

Description

The proposed change will revise Technical Specification 3/4.1.3.6, "Regulating CEA Insertion Limits," Technical Specification 3/4.1.3.7, "Part Length CEA Insertion Limits," Bases 3/4.1.3, "Movable Control Assemblies," and Technical Specification 3/4.10.2, "Group Height, Insertion and Power Distribution Limits." The purpose of Technical Specification 3/4.1.3.6 is to ensure that: 1) the minimum shutdown margin is maintained; and 2) the potential effects of a CEA ejection accident are limited to acceptable levels. Technical Specification 3/4.1.3.7 ensures that adverse power shapes and rapid local power changes which affect radial peaking factors and DNB considerations do not occur as a result of a part length CEA (PLCEA) group covering the same axial segment of the fuel assemblies for an extended period of time during operation. Presently, Specification 3.1.3.7 does not clearly specify the allowable duration within the Transient Insertion nor does it clearly address operation within the Long Term Insertion Limit. The proposed change will also revise Specification 3/4.10.2. The purpose of this specification is to permit special test exceptions which would allow individual CEA's to be positioned outside of their normal group heights and insertion limits during the performance of those physics tests required to: 1) measure CEA worth; and 2) determine the reactor stability index and damping factor under xenon oscillation conditions.

The proposed change consists of four parts as follows:

The proposed change will clarify the intent of Specification 3.1.3.7 to clearly address the allowable duration of the insertion limits allowed by Figure 3.1-3, "Part Length CEA Insertion Limit vs. Thermal Power." Currently, Technical Specification 3.1.3.7 restricts the position of the PLCEA group to prevent the neutron absorber section of the PLCEA group from covering the same axial segment of the fuel assemblies for a period in excess of 7 Effective Full Power Days (EFPD) out of any 30 EFPD period in addition to limiting the

position of the PLCEA group to the insertion limits shown on Figure 3.1-3. Referring to Figure 3.1-3, unrestricted operation with PLCEA insertion up to the Long Term Insertion Limit is allowed which is consistent with the definition of Long Term Steady State Insertion Limit that is applied to the full length CEA's in Specification 3.1.3.6. To further clarify the intent of Specification 3.1.3.7, PLCEA groups shall be limited to the insertion limits shown on Figure 3.1-3 with PLCEA insertion between the Long Term Steady State Insertion Limit and the Transient Insertion Limit to a period less than or equal to 7 EFPD out of any 30 EFPD interval and to a period less than or equal to 14 EFPD per 365 EFPD interval. This additional restriction is provided to prevent long term distortion of the axial burnup distribution. The Action Statement will similarly be revised to address action to be taken should these limits be exceeded. Action Statement b.2 will be revised to be consistent with standard technical specification usage. The new statement will require thermal power to be reduced to less than or equal to 20% of RATED THERMAL POWER within the next four hours. The current Action Statement requires action to continue (go to HOT STANDBY within six hours) after the LCO is no longer applicable (Mode 1 above 20% of RATED THERMAL POWER). Surveillance Requirement 4.1.3.7 will also be revised so that the PLCEA group's position is determined to be within the Transient Insertion Limit at least once per 12 hours, and will include the accumulated time during which the PLCEA groups can be inserted beyond the Long Term Steady State Insertion Limit, but remaining within the Transient Insertion Limit, to be determined at least once per 24 hours. Furthermore, since the insertion limits on Figure 3.1-3 stop at 20% power, operation with PLCEA insertion below 20% power is unrestricted. Therefore, this Specification will be revised to be applicable in Mode 1 above 20% of Rated Thermal Power. As part of this proposed change, Specification 3.1.3.7 will be added to the list of Specifications in Specification 3.10.2 which may be suspended under special test exceptions. Therefore, a footnote has been added to page 3/4 1-25 which refers to the Special Test Exception of Specification 3.10.2. In addition, Figure 3.1-3 will be revised to provide greater consistency between it and Figure 3.1-2 by changing the name of the Long Term Insertion Limit curve to the Long Term Steady State Insertion Limit curve. A typographical error in the Unit 2 figure heading will also be corrected.

The proposed change will also revise Specification 3/4.1.3.6. Technical Specification 3.1.3.6.a (COLSS in-service) currently restricts regulating CEA groups to be limited to the withdrawal sequence and to the insertion limits shown on Figure 3.1-2. The CEA insertion between the Long Term Steady State Insertion Limits and the Transient Insertion Limits is restricted to: 1) less than or equal to 4 hours per 24 hour interval, 2) less than or equal to 5 EFPD per 30 EFPD, and 3) less than or equal to 14 EFPD per calendar year. Specification 3/4.1.3.6.b (COLSS out-of-service) currently limits the regulating CEA groups to the Short Term Steady State Insertion Limit shown on Figure 3.1-2. The CEA insertion between the Long Term Steady State Insertion Limits and the Short Term Steady State Insertion Limits is restricted to the same periods described above for COLSS in-service. The proposed change will revise the CEA insertion between the Long Term Steady State Insertion Limits and the Transient Insertion Limits from 14 EFPD per calendar year to periods

less than or equal to 14 EFPD per 365 EFPD interval. The proposed change will also revise the CEA insertion between the Long Term Steady State Insertion Limits and the Short Term Steady State Insertion Limits from 14 EFPD per calendar year to a period less than or equal to 14 EFPD per 365 EFPD interval. Similarly, part C of the Action Statement will be revised to reflect an interval no greater than 14 EFPD per 365 EFPD interval with the CEA groups inserted between the Long Term Steady State Insertion Limits and the Transient Insertion Limits.

The proposed change will also revise the Bases to Specifications 3.1.3.6 and 3.1.3.7 to clarify the extreme limits of CEA travel (fully withdrawn and fully inserted CEA positions). The terms upper electrical limit and lower electrical limit are used to describe the fully withdrawn and fully inserted CEA positions. Furthermore, the CEA fully withdrawn position will be defined as greater than or equal to 145 inches.

In addition, the proposed change would revise Specification 3/4.10.2. Currently, this specification allows the moderator temperature coefficient, group height, insertion and power distribution limits of Specifications 3.1.1.3, 3.1.3.1, 3.1.3.5, 3.1.3.6, 3.2.2, 3.2.3, 3.2.7, and the minimum channels operable requirement of Functional Unit 15 of Table 3.3-1, to be suspended during the performance of physics tests provided: a) the thermal power is restricted to the test power plateau which shall not exceed 85% of rated thermal power, and b) that the limits of Specification 3.2.1 are maintained and determined as specified in Specification 4.10.2.2. The proposed change will revise Specification 3/4.10.2 to include Specification 3/4.1.3.7 in the list of Specifications which may be suspended during the performance of physics tests as mentioned above. The Unit 2 Specification will be revised to include "moderator temperature coefficient" to the list of limits which may be suspended during physics tests and will provide an editorial correction to the Unit 3 Specification.

#### Safety Analysis

The proposed change discussed above shall be deemed to constitute a significant hazards consideration if there is a positive finding in any 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 proposed change maintains the required shutdown margins in the facility, thus avoiding any increase in the probability or consequences of an accident previously evaluated. The PLCEA insertion limits are included in the ground rules for the reload analyses for each cycle of operation. This change clarifies the Technical Specification for the plant operators to clearly describe the use of the insertion limits. Therefore, operation of the facility in accordance with this proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change will not alter operation of the facility or the manner in which it is operated. The purpose of the proposed change is to clarify the Technical Specifications. Therefore, the proposed change does not create the possibility of a new or different kind 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

Insertion limits remain unchanged, therefore, operation of the facility in accordance with this proposed change does not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (1) relates to a purely administrative change to the Technical Specifications. Changes which achieve consistency throughout the technical specifications, corrections of errors, or changes in nomenclature are all typical of example (1).

Currently, Specification 3/4.1.3.6 provides restrictions on CEA insertion limits to periods less than or equal to 14 EFPD per calendar year. The proposed change will revise the limits on CEA insertion to be restricted to periods less than or equal to 14 EFPD per 365 EFPD interval. This change is necessary to provide greater clarification of the insertion limits of Specification 3.1.3.6. Clearly, calendar year may be defined as the period from January through December, which is not the intent of the interval. This change is similar to example (1) in that it changes the nomenclature and is purely administrative. The proposed change to part c of the associated Action Statement of Specification 3.1.3.6, will revise the 14 EFPD per calendar year interval restriction to 14 EFPD per 365 EFPD interval. This change is similar to example (1) in that it changes the nomenclature, for the reasons stated above, and is purely administrative.

The proposed change will revise Specification 3.1.3.7. The change provides restrictions on PLCEA group insertion to be limited to the insertion limits shown on Figure 3.1-3 with PLCEA insertion between the Long Term Steady State Insertion Limit and the Transient Insertion Limit to be restricted to intervals less than or equal to 7 EFPD per 30 EFPD interval and intervals less than or equal to 14 EFPD per 365 EFPD interval. This change is similar to example (1) in that it clarifies the intent of Specification 3.1.3.7 to apply the 7 EFPD per 30 EFPD interval only to insertions beyond the Long Term Steady

State Insertion Limits shown on Figure 3.1-3. Therefore, this change is purely administrative and similar to example (1). The proposed change will also revise the Action Statement: 1) to clarify action to be taken if PLCEA groups are inserted beyond the Transient Insertion Limit to restore PLCEA groups to within the limit or reduce thermal power to that allowed by Figure 3.1-3, and 2) to clarify action with PLCEA insertion between the Long Term Steady State Insertion Limit and the Transient Insertion Limit for intervals greater than the intervals to restore the PLCEA groups to within the Long Term Steady State Insertion Limit within 2 hours or be in at least hot standby within 6 hours. The proposed change to Action Statement b.2 will revise the current statement to be consistent with standard technical specification usage. Therefore, this change is editorial in nature and is similar to example (1). The Surveillance Requirement will also be revised so that PLCEA group position is determined every 12 hours to be within the Transient Insertion Limit, and to include the accumulated time for PLCEA insertion beyond the Long Term Steady State Insertion Limit, but within the Transient Insertion Limit to be determined every 24 hours. The proposed change will revise the applicability of this specification to Mode 1 above 20% of Rated Thermal Power. In Mode 2, plant operation is limited to 5% of rated thermal power or less. But below 20% of rated thermal power, PLCEA insertion is unrestricted. This change is similar to example (1) because it is editorial. The proposed change will also revise Figure 3.1-3 to make it consistent with Figure 3.1-2 by changing the name of the Long Term Insertion Limit curve to the Long Term Steady State Insertion Limit Curve. Therefore, this change is similar to example (1) in that it achieves consistency throughout the Technical Specifications. The Unit 2 figure heading will also be revised to correct a spelling error. Therefore, the change is similar to example (1) in that the change is editorial in nature. The proposed change will also add a footnote to page 3/4 1-25 which references the Special Test Exception in Specification 3.10.2. The other specifications referenced in Specification 3.10.2 include a similar footnote. Therefore, this change is similar to example (1) in that it achieves consistency throughout the Technical Specifications.

The proposed change will also revise Specification 3/4.10.2 which currently does not reference Specification 3.1.3.7. During Startup Testing after refuelings, and for the proposed Fast Power Ascension Program, the PLCEA groups may be inserted to measure various Planar Radial Peaking Factors. With the addition of Specification 3.1.3.7 to Specification 3.10.2, the PLCEA groups will be allowed to be inserted beyond the insertion limit without reducing reactor power to below 50%. Prior to Amendment Application No. 19, dated January 9, 1985 for San Onofre Unit 3, and Amendment Application No. 30, dated January 9, 1985, for San Onofre Unit 2, there were no power distribution insertion limits for the PLCEA's. With the addition of Figure 3.1-3 to Specification 3.1.3.7, power distribution insertion limits were added, and Specification 3.1.3.7 was inadvertently omitted from Specification 3.10.2. Therefore, this change is similar to example (1). The proposed change also corrects two typographical errors. The change to the Unit 3 Specification adds a comma between moderator temperature coefficient and group height. The change to the Unit 2 Specification adds "moderator temperature coefficient" to

the limits which may be suspended during the performance of physics tests. The Unit 3 specification already includes the moderator temperature coefficient in the limits which may be suspended during the performance of physics tests. Therefore, the changes are similar to example (1) in that they correct an error and provide consistency throughout the Technical Specifications, respectively.

#### Safety and Significant Hazards Determination

Based on the above discussion, the proposed change does not involve a significant hazards consideration in that it does not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. In addition, it is concluded that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (2) 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.

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