

Southern California Edison Company

23 PARKER STREET

IRVINE, CALIFORNIA 92718

September 15, 1993

RICHARD M. ROSENBLUM
VICE PRESIDENT

TELEPHONE
714-458-4550

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Amendment Application Nos. 134 and 118
Automatic Removal of Low Pressurizer Pressure Trip Bypass
San Onofre Nuclear Generating Station
Units 2 and 3

Enclosed are Amendment Application Nos. 134 and 118 to Facility Operating Licenses NPF-10 and NPF-15 for the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, respectively. These amendment applications consist of Proposed Change Number (PCN)-431. PCN-431 is being processed to resolve inconsistencies associated with the Low Pressurizer Pressure (LPP) trip bypass in several Technical Specifications (TSs).

The existing TSs permit a manual bypass of the Reactor Trip and Safety Injection Actuation Signal (SIAS) on LPP below 400 psia. The TSs also require that this bypass be automatically removed above 400 psia. The instrument which automatically removes the bypass is also part of the manual bypass circuitry. This instrument's circuitry requires that following automatic removal of the LPP trip bypass, the pressure be reduced an additional 75 psi (hysteresis) before it will again permit manual bypass. Consequently, it is necessary to depressurize to approximately 325 psia to ensure the bypass feature will be enabled. At 325 psia there is a risk of an undesired SIAS due to the very small margin (25 psi) between the LPP trip (300 psia) and the SIAS bypass (325 psia). Therefore, a higher bypass pressure is desired to preclude the potential for an undesired SIAS.

An analysis of the LPP trip concludes that it is not required below 500 psia. Considering the total loop uncertainties of the instruments in the bypass removal circuitry, a value of 472 psia is proposed for the automatic removal of the bypass feature. The affected TSs are revised accordingly.

In the interim until this license amendment request has been approved by the NRC, procedural actions will be taken to preclude an undesired SIAS. These procedural actions involve resetting the automatic bypass removal to a higher setpoint once the plant has been cooled down to Mode 4 (temperature less than 350°F) but before pressure is reduced below about 500 psia. The interim reset

17007
9309200108 930915
PDR ADOCK 05000361
P PDR

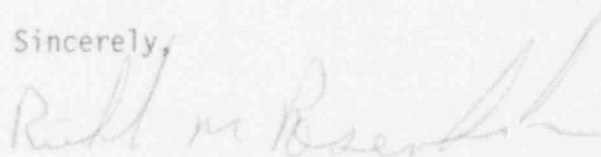
ADD 1/1

to a higher setpoint is acceptable because the LPP trip is not required in Mode 4. However, this delays depressurizing the Reactor Coolant System and going on shutdown cooling. This delay will impact the schedule for the Unit 3 Cycle 7 refueling outage and would complicate the response to any emergency shutdown.

Southern California Edison (SCE) requests the NRC to consider this license amendment request exigent pursuant to 10 CFR 50.91(a)(6) and requests approval of this license amendment request by September 30, 1993. This would permit implementation of the revised TSs prior to the Unit 3 shutdown for the Cycle 7 refueling outage which is currently scheduled to commence October 9, 1993.

If you would like additional information on this Technical Specification change request, please let me know.

Sincerely,



Enclosures

cc: E. H. Faulkenberry, Regional Administrator, NRC Region V
J. J. Russell, Acting NRC Senior Resident Inspector,
San Onofre Units 1, 2&3
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3
H. Kocol, California Department of Health Services

ENCLOSURE 1

PCN-431

PROPOSED CHANGES TO UNITS 2 AND 3 TECHNICAL SPECIFICATIONS (TSs)
Table 2.2-1, 3.3-1, 3.3-3, and 3.3-4; TSs 3/4.5.2 and 3/4.5.3; and
the Bases to TSs 2.2.1, 3/4.3.1, 3/4.3.2, 3/4.5.2, and 3/4.5.3