Southern California Edison Company

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July 6, 1994

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

Gentlemen:

Subject: **Docket No. 50-361**
Supplement 1 to Amendment Application No. 118
Reactor Coolant System Pressure/Temperature Limits
Changes to Technical Specifications 3/4.4.8.1,
3.4.8.3.1, and 3.4.8.3.2
San Onofre Nuclear Generating Station
Unit 2

References: (See Enclosure 1)

Provided as Enclosure 2 is Supplement 1 to Amendment Application No. 118 to Facility Operating License NPF-10 for the San Onofre Nuclear Generating Station, Unit 2. Supplement 1 revises Proposed Change Number (PCN)-335 (Reference 1). PCN-335 is a request to revise Technical Specifications (TSs) 3/4.4.8.1, "Pressure/Temperature Limits," 3.4.8.3.1 "Overpressure Protection Systems-RCS Temperature ≤312°F," and 3.4.8.3.2, "Overpressure Protection Systems-RCS Temperature >312°F."

Supplement 1 to Amendment Application No. 118 is being submitted because 1) the existing Unit 2 Pressure/Temperature (PT) limits and Low Temperature Overpressure Protection (LTOP) enable temperatures expired at 8 Effective Full Power Years (EFPY) in June 1994 and 2) the PT limits and LTOP enable temperatures included in the license amendment request submitted by Reference 1 also expired at 8 EFPY. Supplement 1 revises the PT limits and LTOP enable temperatures to be effective until 20 EFPY.

The new Unit 2 PT limits in this proposed change were calculated based upon 1) predicted fluence values from the Unit 3 surveillance capsule (Reference 2) removed after 4.33 EFPY, 2) updated Unit 2 material properties in response to Generic Letter 92-01, Revision 1, "Reactor Vessel Structural Integrity, 10 CFR 50.54(f)," (References 3, 4, and 5), and 3) methodologies previously reviewed and approved by the NRC. The 20 EFPY curves in this proposed change were developed using an initial RT_{NDT} which was determined in accordance with the 1986 edition of ASME Section III Code, Section NB-2331(a)(3) and consistent with Section C.1.1 of Regulatory Guide 1.99, Revision 2. The new LTOP enable temperatures are based on the methodology recommended in Branch Technical Position RSB 5-2, Revision 1, "Overpressurization Protection of Pressurized Water Reactors While Operating at Low Temperatures."

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By Reference 6 (PCN-354), Southern California Edison (SCE) proposed changes to other portions of TS Index Page XIX, TSs 4.4.8.1.2, and the associated Bases to TS 3/4.4.8. Because these TSs are also affected by this proposed license amendment (PCN-335), TS pages which incorporate changes from PCN-354 and PCN-335 are provided for your information as Enclosure 3. The proposed changes are identified by their respective PCN numbers.

SCE informed the NRC in Reference 1 that administrative PT limits which were more restrictive than the P-T limits proposed in Reference 1 were implemented at Unit 2. SCE will continue this conservative approach and use the same administrative limits until the NRC approves this license amendment request. This is acceptable since the PT limits in this proposed change were also found to be less restrictive than the existing administrative limits in all areas that the plant normally operates and would be expected to operate.

If you have any questions regarding this TS change request, please let me know.

Sincerely,

Enclosures

cc: L. J. Callan, Regional Administrator, NRC Region IV
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 1, 2, and 3
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3
H. Kocol, California Department of Health Services

Enclosure 1

REFERENCES

1. April 30, 1992, letter from Harold B. Ray (SCE) to Document Control Desk (NRC), Subject: Docket No. 50-361, Amendment Application No. 118, Reactor Coolant System Pressure/Temperature Limits, Changes to Technical Specifications 3/4.4.8.1, 3.4.8.3.1, and 3.4.8.3.2, San Onofre Nuclear Generating Station, Unit 2

2. May 3, 1991, letter from F. R. Nandy (SCE) to Document Control Desk (NRC), Subject: Docket No. 50-362, Surveillance Capsule Test Report, San Onofre Nuclear Generating Station, Unit 3

3. July 6, 1992, letter from R. M. Rosenblum (SCE) to Document Control Desk (NRC), Subject: Docket Nos. 50-361 and 50-362, Generic Letter 92-01, Revision 1, "Reactor Vessel Structural Integrity, 10 CFR 50.54(f)," San Onofre Nuclear Generating Station, Units 2 and 3

4. January 29, 1993, letter from Walter C. Marsh (SCE) to Document Control Desk (NRC), Subject: Docket Nos. 50-361 and 50-362, Supplemental Response to Generic Letter 92-01, Revision 1, "Reactor Vessel Structural Integrity, 10 CFR 50.54(f)," San Onofre Nuclear Generating Station, Units 2 and 3

5. June 22, 1994, letter from Walter C. Marsh (SCE) to Document Control Desk (NRC), Subject: Docket Nos. 50-361 and 50-362, Revision to Supplemental Response to Generic Letter 92-01, Revision 1, "Reactor Vessel Structural Integrity, 10 CFR 50.54(f)," San Onofre Nuclear Generating Station, Units 2 and 3

6. September 3, 1992, letter from Harold B. Ray (SCE) to Document Control Desk (NRC), Subject: Docket Nos. 50-361 and 50-362, Proposed Technical Specification Change No. NPF-10/15-354, San Onofre Nuclear Generating Station, Units 2 and 3

ENCLOSURE 2

PROPOSED CHANGE NPF-10-335

UNIT 2