

Southern California Edison Company

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RICHARD M. ROSENBLUM
VICE PRESIDENT

July 28, 1994

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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. 141 and 125
Change to Technical Specification 3.9.8.1 "Shutdown Cooling and
Coolant Circulation -- High Water Level," Technical Specification
3.9.8.2, "Shutdown Cooling and Coolant Circulation -- Low Water
Level," and the Refueling Operations, Bases: 3/4.9.8, "Shutdown
Cooling and Coolant Circulation"
San Onofre Nuclear Generating Station
Units 2 and 3

Enclosed are Amendment Application Numbers 141 and 125 to Facility Operating
Licenses NPF-10 and NPF-15, respectively, for the San Onofre Nuclear
Generating Station Units 2 and 3. These amendment applications consist of
Enclosure 1, Proposed Change Number 402 (PCN-402), and are requests to revise
Technical Specification (TS) 3.9.8.1, TS 3.9.8.2, and their Bases. Also
provided is Enclosure 2, the proposed changes for the Technical Specification
Improvement Program (PCN-299) Technical Specifications.

The purpose of TS 3.9.8.1 and TS 3.9.8.2 is to ensure that: 1) sufficient
cooling is available to remove decay heat from the Reactor Coolant System, 2)
water in the reactor vessel is maintained below 140°F, and 3) sufficient
coolant circulation is maintained in the reactor core to minimize boron
stratification leading to a boron dilution incident.

While not affecting the purpose of the TSs, PCN 402 requests changes which
will facilitate testing of Low Pressure Safety Injection System components and
will permit additional flexibility in scheduling maintenance on the shutdown
cooling system. These changes will provide time savings during outages
without compromising plant safety and, as such, are identified as a Cost
Beneficial Licensing Action (CBLA).

The specific requests made by PCN-402 are as follows:

- 1) reduce the water level where two trains of shutdown cooling (SDC)
are required from 23 feet to 20 feet above the reactor pressure
vessel flange,
- 2) increase the time a required train of the SDC system may be removed
from service from up to 1 hour per 8-hour period to up to 2 hours
per 8-hour period,
- 3) allow the SDC system to be removed from service to allow testing of
Low Pressure Safety Injection system components,

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- 4) allow for running 1 train of shutdown cooling with additional requirements when the water level is less than 20 feet but greater than 12 feet above the reactor pressure vessel flange,
- 5) add an action to be taken when operating 1 train of SDC with less than 20 feet of water above the reactor pressure vessel flange when the specified requirements are not met,
- 6) delete the obsolete reference to the implementation of DCP 2-6863 and MMP 3-6863, and
- 7) delete an obsolete footnote allowing removal of both trains of SDC with the water less than 23 feet above the reactor vessel flange from the Unit 2 TSs.

Parts of this request for a TS change were made possible due to the recent design change which allows us to cross tie the SDC system with the containment spray system. The NRC approved the cross tie design change by License Amendments 106 and 95 for Units 2 and 3, respectively. Now that this capability exists, cost savings due to reduced outage times are possible. The proposed changes will allow the required maintenance and testing to be scheduled and performed in a cost effective way saving Southern California Edison (Edison), et al., approximately 48 hours (approximately \$800,000) of critical path time in the Cycle 8 refueling outage for each Unit. A similar savings is anticipated for future outages.

This amendment application is identified as a CBLA. Therefore, priority review and approval of this amendment application is requested. Edison requests approval by December 31, 1994, to support the San Onofre Unit 2 refueling outage which is anticipated to begin in January of 1995. Edison would like to schedule a meeting to discuss this PCN with the NRC in late August or early September, so that any questions can be addressed and resolved expeditiously.

If you need additional information on this Technical Specification 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
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