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August 25, 1994

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

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**
Amendment Applications 137 and 121, Supplement 2
Technical Specification Improvement Program
San Onofre Nuclear Generating Station
Units 2 and 3

Enclosed is Supplement 2 to Amendment Application No. 137 and Amendment Application No. 121 to Facility Operating Licenses NPF-10 and NPF-15 for the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, respectively. The amendment applications, which were submitted December 30, 1993, consist of Proposed Change Number NPF-10/15-299 (PCN-299) for SONGS Units 2 and 3.

Supplement 2 consists primarily of resolution of comments to NRC questions from the review of PCN-299 including Supplement 1. Supplement 2 includes a description of changes, with the following attachments:

Attachment A: Marked up Proposed Specifications for Unit 2
Attachment B: Marked up Proposed Specifications for Unit 3
Attachment C: Marked up Proposed Table of Contents and Bases for Unit 2
Attachment D: Marked up Proposed Table of Contents and Bases for Unit 3

If you have any questions regarding these changes, please let me know.

Sincerely,

R M Rosenblum

Enclosure

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cc: L. J. Callan, Regional Administrator, NRC Region IV
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Description of Changes

(Revised Proposed SONGS Technical Specifications)

Marked-up Proposed Specifications:

Unit 2: See Attachment "A"
Unit 3: See Attachment "B"

Marked-up Proposed Table of Contents and Bases:

Unit 2: See Attachment "C"
Unit 3: See Attachment "D"

The following is a description of the changes to the proposed SONGS Technical Specifications included in Proposed Change Number 299, including Supplement 1:

Section 1.0

Not affected.

Section 2.0

Not affected.

Section 3.0

Not affected.

Section 3.1

1. Delete SR 3.1.2.1 from proposed TS 3.1.2, "Shutdown Margin (SDM) - $T_{avg} \leq 200°F$" consistent with NUREG 1432. In addition, renumber SR 3.1.2.2 as SR 3.1.2.1. The additional surveillance is not necessary with consideration of TS 3.1.5 and the definition of Shutdown Margin.

2. Revise TS 3.1.5, "Control Element Assembly (CEA) Alignment:"

   a. Revise LCO 3.1.5 to delete "(indicated position, with 2 of 3 position indicators available)." This deletion is to remove redundancy because the CEA position indicators are required to satisfy TS 3.3.3, "Control Element Assembly Calculators (CEACs).

   b. Replace Required Action A.1, B.1, and C.1 with "Initiate THERMAL POWER reduction in accordance with COLR requirements." This clarification is required because the Thermal power reduction cannot practically be accomplished within 15 minutes.

   c. Delete Action D, associated references, Required Actions and Completion Times to remove the ACTIONS in response to inoperable position indication. In addition, relabel Action Condition E to D and Required Action E.1 to D.1.

d. Revise Required Actions B.1 and C.1 by replacing "LCS" with "COLR."

3. Replace LCO 3.1.8, REQUIRED ACTION A.2 with "Reduce THERMAL POWER to less than or equal to that fraction of RTP specified in the COLR." This is to restore the proposed REQUIRED ACTION to be consistent with NUREG 1432.

4. Revise TS 3.1.9, "Boration Systems - Operating" consistent with NUREG 1432 conventions and recommendations.

   a. Replace LCO 3.1.9 with: "Two RCS boron injection flow paths shall be OPERABLE with the contents of the Boric Acid Makeup (BAMU) tanks in accordance with the LCS." Delete LCO 3.1.9 items a and b and relocate the boration flow path Operability details to the Basis. The volume of borated water and boron concentration requirements are specified in the LCSs. Figure 3.1.9-1 is moved to the licensee controlled specifications.

   b. Revise ACTION CONDITION B by adding "A" after "Required Action." and replacing Required Action B.2 with "Restore boron injection flow path to OPERABLE." This change is required to logically close the Action Condition.

   c. Replace ACTION CONDITION C with: "Required Action B and Associated Completion Times not met." This is consistent with proposed change 4a and provides default Required Actions and Completion Times when Action Condition A and B are not satisfied.

   d. Replace TS 3.1.9 Bases with fully developed Bases consistent with the scope and format recommended by NUREG 1432.

5. Replace TS 3.1.10 and TS 3.1.11 with a new single TS 3.1.10. The proposed TS 3.1.10 consolidates the existing TS 3.1.10 and 3.1.11 requirements into a single TS and Bases consistent with the conventions and recommendations of NUREG 1432. The following revisions to 3.1.10 are proposed:

   a. Revise LCO 3.1.10 by replacing "One of the following boron injection flow paths" with "One RCS boron injection flow path" and relocate the operability details in items a and b to the bases.

   b. Revise ACTION CONDITION A by replacing "None of the above flow paths" with "No boron injection flow path."

   c. Redesignate SR 3.1.10.1 as 3.1.10.4 and insert SR 3.1.10.1, 2, and 3 to capture the requirements of existing TS 3.1.11.

   d. PCN 299, Supplement 1 replaced in SR 3.1.10.1, "each valve...automatic)" with "that each valve (manual, power operated or automatic, that is not locked, sealed, or otherwise secured) in the above required flow path." Supplement 2 proposes to delete the word "above" consistent with the removal of the operability details to the Bases. (See Difference Category A4.)

e. Replace TS 3.1.10 Bases with fully developed Bases consistent with the scope and format recommended by NUREG 1432.

6. Delete TS 3.1.11 and Bases. The requirements of TS 3.1.11 have been included in the new proposed TS 3.1.10 (See change #5).

7. Revise TS 3.1.12, "Special Test Exception - MODES 2 and 3" a. Change the title to "Special Test Exception (STE) - Low Power Physics Testing." This is an editorial change to better describe this grouping of LCO exceptions during physics testing.

   b. Delete from LCO 3.1.12 the parenthetical, "(provided the shutdown ... actually withdrawn.)." Append to the end of LCO 3.1.12 the following, "provided, the shutdown reactivity available for trip insertion is equivalent to at least the highest CEA worth." This is an editorial change to improve clarity.

   c. Replace ACTION CONDITION A with, "Less than the required shutdown reactivity is available." This simplifies the ACTION CONDITION statement to correspond directly to the LCO.

   d. Delete SR 3.1.12.2. This surveillance is not required and is redundant to the current SR 3.1.12.3 (to be renumbered below).

   e. Change "SR 3.1.12.3" to "SR 3.1.12.2" and delete the word "equivalent." This is an editorial change to improve clarity.

8. The following revisions to TS 3.1.13, "Special Test Exception - MODE 1"

   a. Change the title to "Special Test Exceptions (STE) - Power Ascension Testing." This is an editorial change to better describe this grouping of LCO exceptions during physics testing.

   b. Delete from LCO 3.1.13: "the requirements of" and replace with "the following LCOs may be suspended." In addition delete "may be suspended." These are editorial changes to improve clarity.

   c. Delete from LCO 3.1.13 condition a, "is restricted to the test power plateau, which shall" and replace with "does." This is an editorial change to remove the ambiguous term "test power plateau."

   d. Delete from ACTION CONDITION A, "plateau exceeded" and replace with "exceeds 85% RTP." This is an editorial change to remove the ambiguous term "test power plateau."

   e. Delete from REQUIRED ACTION A.1, "the test power plateau" and replace with "85% RTP." This is an editorial change to remove the undefined term "test power plateau."

   f. Delete from ACTION C the logical connector AND with Required Action C.2 and the associated Completion Time. This is appropriate because REQUIRED ACTION C.1 discontinues the Applicability of TS 3.1.13 and thereby requires the normally applicable TS Required Actions to be executed.

g. Delete from SR 3.1.13.1, "the test power plateau" and replace with 85% RTP." This is an editorial change to remove the ambiguous term "test power plateau." (See Difference Category A4.)

Section 3.2

1. Revise TS 3.2.2, "Planar Radial Peaking Factors (F_{xy})," by indenting the logical connector AND following Required Action A.1 and renumber A.2.1, A.2.2, and A.3 as A.1.1, A.1.2, and A.2, respectively. This is an editorial change to clearly indicate that Required Action A.3 is an independent option in response to Action Condition A.

Section 3.3

1. The frequency of SR 3.3.1.5 for verifying the total RCS flow rate indicated by each CPC was inadvertently revised to 92 days. The specified frequency has been corrected and is 31 days.

2. LCO 3.3.1, Table 3.3.1-1 (Unit 3 only) Note c in part now reads, "Trips may be bypassed when pressurizer pressure is < 472 psia. Bypass shall be automatically removed when pressurizer pressure is ≥ 472 psia." This change corrects a typographical error and is consistent with PCN-431.

3. The Condition C of LCO 3.3.3 (receipt of a CPC channel B or C cabinet high temperature alarm) Completion Time should be "12 hours and once per 12 hours until high temperature alarm is cleared" as noted in the April 25, 1994 comments. Therefore, this change has been included.

4. Not used.

5. Through Supplement 1, LCO 3.3.10, "Fuel Handling Isolation Signal," was proposed to be relocated to the Licensee Controlled Specifications (LCS). However, based on discussion with Mr. T. R. Tjader, the Fuel Handling Isolation Signal Specification and Bases have been returned to the proposed Specifications with Supplement 2.

6. LCO 3.3.11, Post Accident Monitoring System, Action B.1 and Action H.1 have been revised. The reference to Specification 5.7.2 is correct, as Specification 5.7.2 contains the requirement for Special Reports. However, Specification 5.7.2 does not specifically identify the PAMI report requirement. Therefore, the above actions are revised to explicitly require that a Special Report be prepared and submitted to the NRC within 30 days.

7. In SR 3.3.7.3a, "9228 V" is changed to "4228 V"; this corrects a typographical error.

8. In SR 3.3.9.2, the wording "Allowable Value" is deleted; this corrects a typographical error (the brackets had already been deleted).

Section 3.4

1. In LCO 3.4.1, "RCS Pressure, Temperature, and Flow Limits," and in the Bases 3.4.1, "RCS Pressure, Temperature, and Flow Limits," change the titles of the LCO and Bases to "RCS DNB (Pressure, Temperature, and Flow) Limits." This title is more consistent with NUREG-1432.

2. In the LCO 3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System," Applicability subsection, delete Note 1 that reads: "The SDCS Relief Valve lift setting assumes valve temperatures less than or equal to 130°F." This Note provides unnecessary information. Also, change the word "NOTES" to "NOTE" and delete number "2" in the Note numbering. For Unit 3 the prefix "2" in valve numbering has been changed to "3."

3. In the LCO Surveillance Requirement SR 3.4.12.1.4, include a new Note which reads: "Only required to be performed when the SDCS Relief Valve isolation valve pair is inoperable." This Note is added for clarity and consistency with NUREG-1432. This Note will be numbered "1." The existing Note will be placed after the Note 1 and will be numbered "2."

   The wording of the Surveillance Requirement 3.4.12.1.4 will be changed. The new wording of this SR for Unit 2 is: "Verify the OPERABLE SDCS Relief Valve Isolation valve pair (valve pair 2HV9337 and 2HV9339, or valve pair 2HV9377 and 2HV9378) is in the power lock-open condition." This change was made to clarify the SR 3.4.12.1.4 wording. For Unit 3 the prefix "2" in valve numbering is changed to "3."

4. In LCO 3.4.1, "RCS Pressure, Temperature, and Flow Limits," the wording of the LCO statements b.1, b.2, and b.3 will be changed to:

   b.1. For THERMAL POWER less than or equal to 30% RTP, 520°F $\leq T_c \leq$ 557°F

   b.2. For THERMAL POWER less than 70% RTP and greater than 30% RTP, 535°F $\leq T_c \leq$ 557°F

   b.3. For THERMAL POWER greater than or equal to 70% RTP, 544°F $\leq T_c \leq$ 557°F.

   Also, for LCO 3.4.2, "RCS Minimum Temperature for Criticality," the first statement in the Applicability will be changed to "MODE 1, THERMAL POWER less than or equal to 30% RTP and T_c < 535°F, and..." These changes correct editorial errors and make the proposed LCO and Applicability statements consistent with the existing SONGS Technical Specifications and NUREG-1432.

5. In LCO 3.4.15, "RCS Leakage Detection Instrumentation," in the Condition D statement change the second word "Action" to "Condition." The corrected version of this statement reads: "Required Action and associated Completion Time of Condition A, B, or C not met." This is an editorial change. Also, underline the

logical connector OR in the Required Action B.1.1. This change is made in accordance with the requirements of the "Writer's Guide."

Section 3.5

1. In the Surveillance Requirements (SRs) for LCO 3.5.2, renumber SRs 3.5.2.1.a and 3.5.2.1.b as SRs 3.5.2.1 and 3.5.2.2, respectively, and renumber the remaining SRs. Accordingly, renumber the Bases section for the SRs. This change is in response to NRC comments on PCN-299 to make the numbering system of the SRs consistent with NUREG-1432.

2. In LCO 3.5.2 Applicability section and Required Action B.2, change "472" to "400" to be consistent with the existing TS. The "472" number was consistent with the revision to TS 3.5.2 in PCN-431. PCN-431 is being revised to reflect that the existing TS value of "400" will not change.

3. In LCO 3.5.3 Applicability section change "472" to "400" to be consistent with the existing TS. The "472" number was consistent with the revision to TS 3.5.3 in PCN-431. PCN-431 is being revised to reflect that the existing TS value of "400" will not change.

4. In SR 3.5.3.1, renumber the reference SRs to be consistent with the change in SR numbers for LCO 3.5.2 in Item 1 above.

Section 3.6

1. The Completion Time for Condition E of LCO 3.6.3 has been revised consistent with discussions with Mr. T. R. Tjader. This minor editorial change includes replacing the term "cold shutdown" with the phrase "Mode 5." The change was made for consistency with the Completion Time specified in Condition D and is consistent with usage throughout the Technical Specifications.

Section 3.7

1. In LCO 3.7.1, "Main Steam Safety Valves (MSSVs)," restore Required Action A.2 to reduce the Power Level-High trip setpoint. The Completion Time for Required Action A.2 is 12 hours. Also, the logical connector "AND" will separate the Required Action A.1 and Required Action A.2.

2. Include LCO 3.7.14, "Fuel Handling Building Post-Accident Cleanup Filter System" and the associated Bases in the proposed SONGS Technical Specifications.

3. Not used.

4. In LCO 3.7.6, "Condensate Storage Tank (CST T-121 and T-120)," in the Condition A statement change the word "and" to "or." Also, the Completion Time for the Required Action B.2 will be changed from "36" to "18."

5. In LCO 3.7.14, "Fuel Handling Building Post-Accident Cleanup Filter System," in the Surveillance Requirement SR 3.7.14.1

Frequency statement, delete the words "on a STAGGERED TEST BASIS."

6. In LCO 3.7.17, "Fuel Storage Pool Boron Concentration," in the Surveillance Requirement SR 3.7.17.1 Frequency, change "30" to "7."

Section 3.8

1. In SRs 3.8.1.2 and 3.8.1.3, delete "on a staggered test basis" from the Frequency of the surveillances. This change is in response to NRC comments on PCN-299 to make the surveillance frequency consistent with NUREG-1432.

2. In SR 3.8.1.6, remove "automatically" from the proposed Unit 2 and 3 Technical Specifications to be consistent with the NUREG-1432 markup. This change is in response to NRC comments on PCN-299.

3. In LCO 3.8.4 Actions, revert to the wording of the original PCN-299 submittal (withdraw Supplement 1 request).

4. In SR 3.8.4.6, change the battery charger voltage from "≥125 V" to "≥129 V." This change is in response to NRC comments on PCN-299.

5. In SR 3.8.4.7, change Note 1 to read "SR 3.8.4.8 may be performed in lieu of SR 3.8.4.7 once per 48 months." Replace the Note from NUREG-1432 which prohibits performing SR 3.8.4.7 in Modes 1, 2, 3, or 4. Change the Bases section for SR 3.8.4.7 accordingly. This change is in response to NRC comments on PCN-299.

6. In SR 3.8.4.8, include the Note from NUREG-1432 which prohibits performing SR 3.8.4.8 in Modes 1, 2, 3, or 4. Change the Bases section for SR 3.8.4.8 accordingly. This change is in response to NRC comments on PCN-299.

7. In SR 3.8.6.3, change "≥60°F" to ">60°F" to be consistent with the Bases for SR 3.8.6.3. In the Bases for SR 3.8.6.3 add a paragraph which elaborates on the term "representative cells." These changes are in response to NRC comments on PCN-299.

8. Change "recharge" to read "charge" in Note c of Table 3.8.6-1. This change is in response to NRC comments on PCN-299.

9. In LCO 3.8.7, delete the Notes which permit a single inverter to be disconnected from its DC bus for up to 24 hours to perform an equalizing charge on its associated battery. The Notes are not necessary because 1) an equalizing charge can be applied to individual cells and 2) the equalizing charge for the entire battery is less than 140 Vdc and up to 140 Vdc is allowed for input to the inverters. Accordingly, delete from the Bases section for LCO 3.8.7 the paragraph associated with the deleted Notes. These changes are in response to NRC comments on PCN-299.

10. In LCO 3.8.7 Actions, revert to the wording of the original PCN-299 submittal (withdraw Supplement 1 request). This change is in response to NRC comments on PCN-299 Supplement 1.

11. In LCO 3.8.9 Actions, revert to the wording of the original PCN-299 submittal (withdraw Supplement 1 request). This change is in response to NRC comments on PCN-299 Supplement 1.

Section 3.9

Not affected.

Section 4.0

Not affected.

Section 5.0

Not affected.

ATTACHMENT "A"
(Marked-Up Proposed Specifications)
Unit 2