

*Southern California Edison Company*

23 PARKER STREET

IRVINE, CALIFORNIA 92718

RICHARD M. ROSENBLUM  
VICE PRESIDENT

September 22, 1994

TELEPHONE  
714-455-4550

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

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
Supplement to Amendment Application Nos. 130 and 114  
Change to Technical Specification 3/4.7.1.1,  
"Main Steam Safety Valves"  
San Onofre Nuclear Generating Station  
Units 2 and 3

- References:
- 1) March 5, 1993, letter from Harold B. Ray (SCE) to Document Control Desk (NRC), Subject: "Amendment Application Nos. 130 and 114, Change to Technical Specification 3/4.7.1.1, 'Main Steam Safety Valves,' San Onofre Nuclear Generating Station, Units 2 and 3."
  - 2) December 30, 1993, letter from R. M. Rosenblum (SCE) to Document Control Desk (NRC), Subject: "Proposed Change Number 299, Technical Specification Improvement Project, San Onofre Nuclear Generating Station, Units 2 and 3."

Provided as an enclosure is Supplement 1 to Amendment Application Nos. 130 and 114 to Facility Operating Licenses NPF-10 and NPF-15, respectively, for the San Onofre Nuclear Generating Station, Units 2 and 3. These Amendment Applications, submitted to the NRC by Reference 1, consisted of Proposed Change Number (PCN) 329. PCN 329 is a request to revise Technical Specification (TS) 3/4.7.1.1, "Main Steam Safety Valves," and the associated Bases.

Southern California Edison (Edison) proposed several changes to TS 3.7.1.1 as part of the original proposed change. These changes included revising Table 3.7-2 to require a reduction in steady state operating power with Main Steam Safety Valves (MSSVs) INOPERABLE, instead of the existing reduction in the Linear Power-High Trip Setpoint. Associated with this change was a request to revise Table 3.7-2 to change the allowed steady state power levels with MSSVs inoperable. Supplement 1 is being submitted to withdraw the request for these two changes.

The technical justification given for not lowering Linear Power-High Trip setpoints during operation with inoperable MSSVs was that the limiting events involving a reactor power increase followed by MSSV demand were either insensitive to or did not require trip on high linear power. However, Edison

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subsequently determined that the Control Element Assembly (CEA) withdrawal event may become limiting as an infrequent (vs. moderate frequency) event if a concurrent loss of offsite power is assumed. Such an infrequent category event is not currently analyzed in the UFSAR. A detailed analysis of this event would be needed to verify if a trip setpoint reduction is required. At this time such an analysis has not been performed. Therefore, Edison is withdrawing this part of PCN 329.

The associated change to Table 3.7-2, which reduced the maximum allowable steady state power levels by approximately 2%, would have allowed margin for power level indication error. This change was proposed because instrument indication rather than trip setpoint would have been relied upon to ensure maximum steady-state power level.

In accordance with this supplement to PCN 329, ACTION 3.7.1.1 will remain in its existing form. That is, ACTION 3.7.1.1 will require lowering of the Linear Power-High Trip setpoints. Therefore, the power level values in Table 3.7-2 do not require margin for power indication error. Edison is therefore withdrawing the request to revise the power level values listed in Table 3.7-2. The existing Table 3.7-2 provides appropriate allowable values for the Linear Power-High Trip with inoperable MSSVs based on the original CE standard TSs. These power level values are conservative when compared to limiting values provided by CE for a Loss of Condenser Vacuum with a Single Failure (which is the limiting event) assuming MSSVs have a setpoint tolerance of up to +2%.

PCN 329 also included proposed changes to the Bases for TS 3.7.1.1. Supplement 1 revises these proposed bases to reflect the withdrawal of the proposed change requests for Table 3.7-2. The pleading pages of PCN 329 also reference the change to require a reduction in steady state operating power as opposed to lowering linear power-high trip setpoints with INOPERABLE MSSVs. This reference is removed by Supplement 1.

Additionally, three other clarifications and editorial changes to PCN 329 are requested by Supplement 1. These three changes are as follows:

1. Correct an error in the characterization of "Item 4" of PCN 329 in the pleading pages and the header paragraph of the "Description and Safety Analysis" section. In both of these places, this item was described as revising ACTION 3.7.1.1 to require HOT STANDBY instead of HOT SHUTDOWN. This item actually revises ACTION 3.7.1.1 to require HOT SHUTDOWN instead of COLD SHUTDOWN. This item is correctly described elsewhere in the PCN and Supplement 1 corrects these editorial errors to avoid any confusion as to the correct meaning of this change.
2. Revise the title of Column 1 of Table 3.7-2 to read, "Number of OPERABLE Safety Valves per OPERABLE Steam Generator," instead of "Minimum Number of OPERABLE Safety Valves per OPERABLE Steam Generator." This is a clarification to avoid the possible misinterpretation that, for instance, 8 OPERABLE Safety Valves

fits the definition of "a minimum of 7 OPERABLE Safety Valves." This misinterpretation could result in an overly conservative power reduction being required for a situation with INOPERABLE MSSVs.

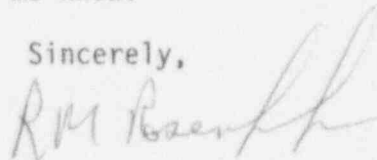
3. Add a revised Index page to reflect the change in the Title to Table 3.7-2.

Other than the changes discussed above, all aspects of PCN 329 remain unchanged.

By Reference 2, Edison submitted PCN 299, "Technical Specification Improvement Project (TSIP)." Markups of the proposed TSIP pages, including the proposed changes resulting from this supplement to PCN 329, will be included as part of Supplement 3 of TSIP.

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

Sincerely,



cc: L. J. Callan, Regional Administrator, NRC Region IV  
A. B. Beach, Director, Division of Reactor Projects, 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