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January 19, 1995

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

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**
Amendment Application Numbers 137 and 121, Supplement 4
Technical Specification Improvement Program
San Onofre Nuclear Generating Station, Units 2 and 3

Enclosed is Supplement 4 to Amendment Application Number 137 and Amendment Application Number 121 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, which were submitted December 30, 1993, consist of Proposed Change Number NPF-10/15-299 (PCN-299).

Supplement 4 consists primarily of the following items as discussed with the USNRC TSIP Review Coordinator, Mr. T.R. Tjader:

- Reference to approved Core Operating Limit Report (COLR) calculations in the Administrative Chapter, Chapter 5.0,
- Replacement of references to the Pressure-Temperature Limit Report (PTLR) with curves submitted for NRC approval under PCN-335 and PCN-359,
- Addition of Surveillance Requirements for Degraded Grid Voltage time delays, and
- Restoration of certain tank inventory requirements to contained volume units to coincide with the safety analysis and the existing Technical Specifications units.

Supplement 4 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 Bases for Unit 2
Attachment D: Marked up Proposed Bases for Unit 3

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

Sincerely,

Enclosure

cc: L. J. Callan, Regional Administrator, NRC Region IV
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R. Burski, Combustion Engineering Owners Group

bcc: (See attached sheet)

Description of Changes
(Revised Proposed SONGS Technical Specifications)

Marked-up Proposed Specification:

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

Marked-up Proposed 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 NPF-10/15-299, including Supplements 1, 2, and 3:

Section 1.0

1. Delete the definition for the "PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)." All references to the "PRESSURE AND TEMPERATURE LIMITS REPORT" or to "PTLR" will be changed to the Units 2 and 3 Technical Specifications P/T curves and limits proposed in PCNs 335 and 359. Approval of the proposed SONGS Units 2 and 3 PTLR methodology would have required excessive review time to accomplish concurrent with the TSIP conversion review. Therefore, the existing figures and tables concerning Low Temperature Overpressure Protection are being reinstated in the SONGS Units 2 and 3 proposed Technical Specifications.

Section 2.0

Not affected.

Section 3.0

Not affected.

Section 3.1

Not affected

Section 3.2

Not affected.

Section 3.3

1. LCO 3.3.7, "Diesel Generator (DG) - Undervoltage Start," will be revised. Specifically, SR 3.3.7.3 requires a channel calibration to determine certain setpoint allowable values. The proposed change will revise the time delay for the degraded voltage function.

Section 3.4

1. In LCO 3.4.1, "RCS DNB (Pressure, Temperature and Flow) Limits," insert the words "or equal to" after the words "For THERMAL POWER less than." This change was made to comply with the existing SONGS Units 2 and 3 Technical Specification 3.2.6, "Reactor Coolant Cold Leg Temperature," requirements.

2. In LCO 3.4.1, "RCS DNB (Pressure, Temperature and Flow) Limits," delete the words "or equal to" in the statement b.3 after the words "For THERMAL POWER greater than." This change was made to comply with the existing SONGS Units 2 and 3 Technical Specification 3.2.6, "Reactor Coolant Cold Leg Temperature," requirements.

3. In LCO 3.4.1, "RCS DNB (Pressure, Temperature and Flow) Limits," insert the words "or equal to" in SR 3.4.1.2.2 after the words "For THERMAL POWER less than." This change was made to comply with the existing SONGS Units 2 and 3 Technical Specification 3.2.6, "Reactor Coolant Cold Leg Temperature," requirements.

4. In LCO 3.4.1, "RCS DNB (Pressure, Temperature and Flow) Limits," delete the words "or equal to" in SR 3.4.1.2.2 after the words "For THERMAL POWER greater than." This change was made to comply with the existing SONGS Units 2 and 3 Technical Specifications 3.2.6, "Reactor Coolant Cold Leg Temperature," requirements.

5. In LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits," insert the words "Figure 3.4.3-1, Figure 3.4.3-2, Figure 3.4.3-3, Figure 3.4.3-4, Figure 3.4.3-5, and Table 3.4.3-1." All references to the "PRESSURE AND TEMPERATURE LIMITS REPORT" or to "PTLR" will be changed to the Units 2 and 3 Technical Specifications P/T curves and limits proposed in PCNs 335 and 359. Approval of the proposed SONGS Units 2 and 3 PTLR methodology would have required excessive review time to accomplish concurrent with the TSIP conversion review. Therefore, the figures and tables concerning Low Temperature Overpressure Protection are being reinstated in the SONGS Units 2 and 3 proposed Technical Specifications.

6. In LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits," SR 3.4.3.1, insert the words "Figure 3.4.3-1, Figure 3.4.3-2, Figure 3.4.3-3, Figure

3.4.3-4, Figure 3.4.3-5, and Table 3.4.3-1." All references to the "PRESSURE AND TEMPERATURE LIMITS REPORT" or to "PTLR" will be changed to the Units 2 and 3 Technical Specifications P/T curves and limits proposed in PCNs 335 and 359. Approval of the proposed SONGS Units 2 and 3 PTLR methodology would have required excessive review time to accomplish concurrent with the TSIP conversion review. Therefore, the figures and tables concerning Low Temperature Overpressure Protection are being reinstated in the SONGS Units 2 and 3 proposed Technical Specifications.

7. In LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits," for SONGS Unit 2, include:

   - Figure 3.4.3-1, "SONGS 2 HEATUP RCS PRESSURE/TEMPERATURE LIMITATIONS UNTIL 20 EFPY. NORMAL OPERATION,"
   - Figure 3.4.3-2, "SONGS 2 COOLDOWN RCS PRESSURE/TEMPERATURE LIMITATIONS UNTIL 20 EFPY. NORMAL OPERATION,"
   - Figure 3.4.3-3, "SONGS 2 RCS PRESSURE/TEMPERATURE LIMITS. MAXIMUM ALLOWABLE COOLDOWN RATES (UNTIL 20 EFPY). NORMAL OPERATION,"
   - Figure 3.4.3-4, "SONGS 2 COOLDOWN RCS PRESSURE/TEMPERATURE LIMITATIONS UNTIL 20 EFPY. REMOTE SHUTDOWN OPERATION,"
   - Figure 3.4.3-5, "SONGS 2 RCS PRESSURE/TEMPERATURE LIMITS. MAXIMUM ALLOWABLE COOLDOWN RATES (UNTIL 20 EFPY). REMOTE SHUTDOWN OPERATION," and
   - Table 3.4.3-1, "Low Temperature RCS Overpressure Protection Range."

   Similarly, the SONGS Unit 3 specific Figures and Table will be included in the proposed Unit 3 LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits."

   All references to the "PRESSURE AND TEMPERATURE LIMITS REPORT" or to "PTLR" will be changed to the Units 2 and 3 Technical Specifications P/T curves and limits proposed in PCNs 335 and 359. Approval of the proposed SONGS Units 2 and 3 PTLR methodology would have required excessive review time to accomplish concurrent with the TSIP conversion review. Therefore, the figures and tables concerning Low Temperature Overpressure Protection are being reinstated in the SONGS Units 2 and 3 proposed Technical Specifications.

8. In LCO 3.4.3.1, "Pressurizer Heatup and Cooldown Limits," change the LCO statement to: "Pressurizer heatup and cooldown rates shall be maintained within the following limits:

   a. A maximum heatup of 200°F in any 1 hour period,

   b. A maximum cooldown of 200°F in any 1 hour period."

   All references to the "PRESSURE AND TEMPERATURE LIMITS REPORT" or to "PTLR" will be changed to the Units 2 and 3 Technical Specifications P/T curves and limits proposed in PCNs 335 and 359. Approval of the

proposed SONGS Units 2 and 3 PTLR methodology would have required excessive review time to accomplish concurrent with the TSIP conversion review. Therefore, the figures and tables concerning Low Temperature Overpressure Protection are being reinstated in the SONGS Units 2 and 3 proposed Technical Specifications.

9. In LCO 3.4.3.1, "Pressurizer Heatup and Cooldown Limits," change SR 3.4.3.1.1 to:

   "Verify Pressurizer heatup and cooldown rates within the following limits:

   a. A maximum heatup of 200°F in any 1 hour period,

   b. A maximum cooldown of 200°F in any 1 hour period."

   All references to the "PRESSURE AND TEMPERATURE LIMITS REPORT" or to "PTLR" will be changed to the Units 2 and 3 Technical Specifications P/T curves and limits proposed in PCNs 335 and 359. Approval of the proposed SONGS Units 2 and 3 PTLR methodology would have required excessive review time to accomplish concurrent with the TSIP conversion review. Therefore, the figures and tables concerning Low Temperature Overpressure Protection are being reinstated in the SONGS Units 2 and 3 proposed Technical Specifications.

10. In LCO 3.4.3.1, "Pressurizer Heatup and Cooldown Limits," change the SR 3.4.3.1.2 to: "The spray water temperature differential shall be determined for use in the UFSAR." This change was made because Table 5.7-1, "Component Cyclic or Transient Limits," was relocated to the UFSAR.

11. In LCO 3.4.6, "RCS Loops-MODE 4," change the wording of the LCO NOTE 2, SONGS Unit 2, to "No RCP shall be started with any RCS cold leg temperature ≤ 256°F." For SONGS Unit 3 the wording of this NOTE is "No RCP shall be started with any RCS cold leg temperature ≤ 246°F." This change was made for consistency with the proposed deletion of the PTLR from the SONGS Units 2 and 3 Technical Specifications.

12. In LCO 3.4.6, "RCS Loops-MODE 4," change the wording of the LCO NOTE 2a, from "level is < 60%" to "volume is < 900 ft^3." This restores the units to those used in the safety analysis and the existing Technical Specifications.

13. In LCO 3.4.7, "RCS Loops-MODE 5, Loops Filled" change the wording of LCO NOTE 4, SONGS Unit 2, to "No reactor coolant pump (RCP) shall be started with one or more of the RCS cold leg temperatures ≤ 256°F." For SONGS Unit 3 the wording of this NOTE is "No reactor coolant pump (RCP) shall be started with one or more of the RCS cold leg temperatures ≤ 246°F." This change was made for consistency with the proposed deletion of the PTLR from the SONGS Units 2 and 3 Technical Specifications.

14. In LCO 3.4.7, "RCS Loops-MODE 5, Loops Filled" change the wording of LCO NOTE 4a, from "level is < 60%" to "volume is < 900 ft^3." This restores the units to those used in the safety analysis and the existing Technical Specifications.

15. In LCO 3.4.9, "Pressurizer," change the LCO a) statement wording to: "Pressurizer water volume ≤ 900 ft^3, and." This restores the units to those used in the safety analysis and the existing Technical Specifications.

16. In the LCO 3.4.9, "Pressurizer," change the CONDITION A statement from "level" to "volume." This restores the units to those used in the safety analysis and the existing Technical Specifications.

17. In LCO 3.4.9, "Pressurizer," change SR 3.4.9.1 from "level is ≤ 60%" to "volume is ≤ 900 ft^3." This restores the units to those used in the safety analysis and the existing Technical Specifications.

18. In LCO 3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System," for SONGS Unit 2, change the second line of the LCO title to "RCS Temperature ≤ 256°F." For SONGS Unit 3, the second line of the LCO title should be changed to "RCS Temperature ≤ 246°F."

    Change the word "PTLR" to "specified in Figure 3.4.3-2" in the LCO statement.

    Change the words "the PTLR" to "Table 3.4.3-1" in the APPLICABILITY statement.

    Change the word "PTLR" to "Figure 3.4.3-2" in the APPLICABILITY NOTE 1 statement.

    Change the words "the PTLR" to "Figure 3.4.3-1, Figure 3.4.3-2" in the APPLICABILITY NOTE 1 statement.

    Change the words "the PTLR" to "Figure 3.4.3-1, Figure 3.4.3-2" in the CONDITION B and REQUIRED ACTION C.1 statements.

    Delete the word "PTLR" and add "specified in Figure 3.4.3-2" at the end of the SR 3.4.12.1.2 statement.

19. In LCO 3.4.12.2, "Low Temperature Overpressure Protection (LTOP) System," SONGS Unit 2, change the second line of the LCO title to "RCS Temperature > 256°F." For SONGS Unit 3, the second line of the LCO title should be changed to "RCS Temperature > 246°F."

    Change the words "the PTLR" to "Table 3.4.3-1" in the APPLICABILITY statement.

    All references to the "PRESSURE AND TEMPERATURE LIMITS REPORT" or to "PTLR" will be changed to the Units 2 and 3 Technical Specifications P/T

curves and limits proposed in PCNs 335 and 359. Approval of the proposed SONGS Units 2 and 3 PTLR methodology would have required excessive review time to accomplish concurrent with the TSIP conversion review. Therefore, the figures and tables concerning Low Temperature Overpressure Protection are being reinstated in the SONGS Units 2 and 3 proposed Technical Specifications.

Section 3.5

1. In LCO 3.5.1, "Safety Injection Tanks (SIT)," in SR 3.5.1.2, delete the words "(78% wide range)" and "(84% wide range)." This restores the specification to the existing Technical Specification values.

2. In LCO 3.5.4, "Refueling Water Storage Tank (RWST)," in SR 3.5.4.2, delete the number "(88%)." This restores the specification to the existing Technical Specification value.

Section 3.6

Not affected.

Section 3.7

1. In LCO 3.7.6, change the values in percent to gallons. The proposed LCO statement will read: "The CST T-121 contained volume shall be ≥ 144,000 gallons and CST T-120 contained volume shall be ≥ 280,000 gallons." This restores the units to those used in the safety analysis and the existing Technical Specifications.

2. In LCO 3.7.6 CONDITION A, change the word "levels" to "contained volumes." This change is required due to change #1, above.

3. In LCO 3.7.6 REQUIRED ACTION A.2, change the word "levels" to "contained volumes." This change is required due to change #1, above.

4. In LCO 3.7.6 SR 3.7.6.1, change the word "levels" to "contained water volumes." This change is required due to change #1, above.

5. In LCO 3.7.11, "Control Room Emergency Air Cleanup System," delete the words "on a STAGGERED TEST BASIS" from SR 3.7.11.4. The definition for the "STAGGERED TEST BASIS" under the new Technical Specification Standard (NUREG 1432) is different from the previous Standard (NUREG-0212). Therefore, this change was made to maintain the existing SONGS Units 2 and 3 operating requirements.

6. In LCO 3.7.11, "Control Room Emergency Air Cleanup System," in SR 3.7.11.4, change the word "one" to "each." This change was made for technical consistency with change #5.

Section 3.8

Not affected.

Section 3.9

1. LCO 3.9.3, "Containment Penetrations," LCO statement b.2 will be modified. The proposed version is: "

   b. One door in each air lock closed

   ----------NOTE----------
   Both doors of the containment personnel airlock may be open provided:

   a. one personnel airlock door is OPERABLE, and

   b.1 the plant is in MODE 6 with 23 feet of water above the fuel in the reactor vessel, or

   b.2 defueled configuration with fuel in containment (i.e., fuel in refueling machine or upender).
   ----------"

This change was made to permit movement of fuel by the fuel handling equipment when there is no fuel in the reactor vessel.

Section 4.0

Not affected.

Section 5.0

1. In Section 5.7.1.5.b, the fifteen references for the analytical methods promulgated by Combustion Engineering and approved by the NRC are added. The specific references are included per the request of the NRC Staff.

2. Delete Section 5.7.1.6, "RCS PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR), and replace with "Not used."

   All references to the "PRESSURE AND TEMPERATURE LIMITS REPORT" or to "PTLR" will be changed to the Units 2 and 3 Technical Specifications P/T curves and limits proposed in PCNs 335 and 359. Approval of the proposed SONGS Units 2 and 3 PTLR methodology would have required excessive review time to accomplish concurrent with the TSIP conversion review. Therefore, the existing figures and tables concerning Low Temperature Overpressure Protection are being reinstated in the SONGS Units 2 and 3 proposed Technical Specifications.