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January 3, 1995

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

Gentlemen:

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

Enclosed is Supplement 3 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, 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 3 consists primarily of resolution of comments made during the Proof and Review Meeting held September 12 and 13, 1994. Additionally, Supplement 3 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

In addition, Supplement 3 will remove changes proposed under PCN-405, PCN-418, and PCN-431 which had previously been incorporated into PCN-299. These changes will continue to be pursued as separate license amendment applications.

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

Sincerely,

Enclosures

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**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 and 2:

**Section 1.0**

1. NUREG-1432 Example 1.3-3, of Section 1.3, Completion Times, will be reinstated in the proposed SONGS Technical Specifications. This example illustrates the "Flip-Flop" aspect of the revised standard technical specifications.

The subsequent examples in Section 1.3 have been renumbered.

**Section 2.0**

Not affected.

**Section 3.0**

Not affected.

**Section 3.1**

1. Delete from LCO 3.1.10, "and capable of being powered from an OPERABLE emergency power source" and delete from Condition A, "or capable of being powered from an OPERABLE emergency power source." Specification of an operable emergency power supply is not required with consideration of the definition of operability. In addition, the note modifying SR 3.1.10.1 is moved to precede the surveillance statement.
2. In LCO 3.1.13, delete the extraneous line from the bottom of page 3.1-28. Additionally, revise the wording of LCO 3.1.13.a, to replace the phrase "does not exceed," with "less than or equal to," and in Condition A, replace the phrase "exceeds," with "greater than."

3. Revise the title of LCO 3.1.14 from "Special Test Exceptions (STE) - Center CEA Misalignment and Regulating CEA Insertion Limits," to "Special Test Exceptions (STE) Reactivity Coefficient Testing." This is consistent with the proposed Bases changes submitted in Supplement 2.

## Section 3.2

Not affected.

## Section 3.3

1. SR 3.3.1.12 has been revised consistent with the LCO. LCO 3.3.1 requires operability of the "operating" bypasses. SR 3.3.1.12 requires a channel functional test of the operating bypass.
2. Table 3.3.1-1, "Reactor Protective Instrumentation," Note a, has been revised. The "<" will be revised to " $\leq$ ."
3. Table 3.3.1-1, "Reactor Protective Instrumentation," Note c, has been revised. This note will be restored to indicate the pressurizer pressure setpoints identified in the current SONGS Units 2 and 3 Technical Specifications.

PCN-431 will address the proposed changes to the setpoints separately from PCN-299.

4. Condition C and Condition D of LCO 3.3.2 have been revised consistent with the LCO. LCO 3.3.2 requires operability of the "operating" bypasses. Conditions C and D specify the situation where one or two operating bypasses, respectively, are inoperable.
5. SR 3.3.2.3 has been revised consistent with the LCO. LCO 3.3.2 requires operability of the "operating" bypasses. SR 3.3.1.2.3 requires a channel functional test of the operating bypass.
6. Similar to the above change, Table 3.3.5-1, "Engineered Safety Features Actuation System Instrumentation," Note b, has been revised. This note will also be restored to indicate the pressurizer pressure setpoints identified in the current SONGS Units 2 and 3 Technical Specifications.

PCN-431 will address the proposed changes to the setpoints separately from PCN-299.

7. Not used.

8. The note modifying the Applicability of LCO 3.3.8 has been clarified. The note will be revised to state "appropriate" rather than "at least one" isolation device.

An editorial correction will also be made to align the word "containment" with the rest of the Applicability statement.

9. This change returns the particulate/iodine channels back to proposed LCO 3.3.9.

PCN-405 is the request to delete the particulate/iodine channels from the Control Room Isolation Signal.

10. A typographical error will be corrected in Action A.2 of LCO 3.3.13. The referenced surveillance requirements are currently misordered.

#### Section 3.4

1. In LCO 3.4.1, "RCS DNB (Pressure, Temperature, and Flow) Limits," change the wording of the LCO 3.4.1.b statement to:

- "1. For THERMAL POWER less than or equal to 30% RTP,  $522^{\circ}\text{F} \leq T_c \leq 558^{\circ}\text{F}$
2. For THERMAL POWER less than 70% RTP and greater than 30% RTP,  $535^{\circ}\text{F} \leq T_c \leq 558^{\circ}\text{F}$
3. For THERMAL POWER greater than or equal to 70% RTP,  $544^{\circ}\text{F} \leq T_c \leq 558^{\circ}\text{F}.$ "

This change incorporates revisions made to the total loop uncertainties calculations for these instruments.

2. In LCO 3.4.1, "RCS DNB (Pressure, Temperature, and Flow) Limits," change the wording of the surveillance requirement SR 3.4.1.2 to:

"Verify RCS cold leg temperature:

1. For THERMAL POWER less than or equal to 30% RTP,  $522^{\circ}\text{F} \leq T_c \leq 558^{\circ}\text{F}$
2. For THERMAL POWER less than 70% RTP and greater than 30% RTP,  $535^{\circ}\text{F} \leq T_c \leq 558^{\circ}\text{F}$
3. For THERMAL POWER greater than or equal to 70% RTP,  $544^{\circ}\text{F} \leq T_c \leq 558^{\circ}\text{F}.$

This change incorporates revisions made to the total loop uncertainties calculations for these instruments.

3. In LCO 3.4.1, "RCS DNB (Pressure, Temperature, and Flow) Limits," change the wording of the LCO 3.4.1.c statement to "RCS total flow rate  $\geq 148\text{E}6$  lbm/hr and  $\leq 177.6\text{E}6$  lbm/hr." This change is made per NRC request to strictly adhere to the NUREG-1432.
4. In LCO 3.4.1, "RCS DNB (Pressure, Temperature, and Flow) Limits," change the wording of the surveillance requirements SR 3.4.1.3 statement to "Verify RCS total flow rate  $\geq 148\text{E}6$  lbm/hr and  $\leq 177.6\text{E}6$  lbm/hr." This change is made per NRC request to strictly adhere to NUREG-1432.
5. In LCO 3.4.2, "RCS Minimum Temperature for Criticality," change the temperature value in LCO 3.4.2 to "522°F." Also, the temperature value in the SR 3.4.2.1 was changed to "522°F." The Applicability will be changed to "Mode 1, THERMAL POWER  $\leq 30\%$  RTP and  $T_c < 535^\circ\text{F}$ , and." This change incorporates revisions made to the total loop uncertainties calculations for these instruments.
6. In LCO 3.4.15, "RCS Leak Detection Instrumentation," in the Required Action column, include the new Required Action A.1 "Perform SR 3.4.13.1." The Completion Time for this Required Action A.1 is "Once per 24 hours." The existing Required Action A.1 will be renumbered to "A.2." A logical connector "AND" will be inserted in the Required Action column between Required Action A.1 and Required Action A.2. This change is made for consistency with NUREG-1432.

### Section 3.5

1. Not affected.

### Section 3.6

1. An exception to the requirements of LCO 3.0.4 is currently in the SONGS Specifications and this exception is carried forth here in LCO 3.6.2. However, as discussed with Mr. T. R. Tjader the note has been moved to SR 3.6.2.2 where it is more appropriately located. Therefore, the note would now read, "SR 3.0.4 is not applicable."

Due to the addition of the note, editorial changes are made to the existing note.

2. An exception to the requirements of LCO 3.0.4 is currently in the SONGS Specifications and this exception is carried forth here in LCO 3.6.2. However, as discussed with Mr. T. R. Tjader the note has been moved to SRs 3.6.3.3, 3.6.3.4, and 3.6.3.7 where it is more appropriately located. Therefore, the note would now read, "SR 3.0.4 is not applicable."



3. A number of editorial corrections are also made. They are as follows:

- Spelling out LCS on first usage,
- Deleting the number "1" from the note modifying the SRs, and
- correcting a typographical error in the frequency column of SR 3.6.3.7.

4. As a result of reinstating NUREG-1432 Example 1.3-3, of Section 1.3, "Completion Times," LCO 3.6.6.1, "Containment Spray and Cooling System," has been revised. As previously discussed, Example 1.3-3 addresses the "Flip-Flop" aspect of the Technical Specifications. Specifically, the Completion Time for Action A.1 and Action C.1 would include the additional completion time of "AND 10 days from discovery of failure to meet the LCO."

This Completion Time is consistent with NUREG-1432.

### Section 3.7

1. In LCO 3.7.1, "Main Steam Safety Valves (MSSVs)," change the wording of the LCO statement to, "The MSSVs shall be OPERABLE as specified in Table 3.7.1-1 and Table 3.7.1-2." This change is consistent with NUREG-1432, versus use of the SAVOR Licensee Controlled Specification.

The inclusion of Table 3.7.1-1 and Table 3.7.1-2, restores information pertaining to the maximum allowable linear power level--high trip setpoints versus operable MSSVs, and the MSSVs and their setpoints.

2. In LCO 3.7.1, "Main Steam Safety Valves (MSSVs)," change the words in Required Action A.1 from "the SAVOR" to "Table 3.7.1-1." Also, delete the words "or equal to" from the Required Action A.1 statement. This incorporates a comment from the NRC Review Coordinator.

3. In LCO 3.7.1, "Main Steam Safety Valves (MSSVs)," change the words in Required Action A.2 from "as specified in the SAVOR" to "in accordance with Table 3.7.1-1." This change is consistent with restoration of this specification to NUREG 1432, versus use of the SAVOR Licensee Controlled Specification. The following modifications were made to the NUREG version during the September 12-13 Proof and Review Meeting:

- In LCO 3.7.1, "Main Steam Safety Valves (MSSVs)," delete the column "Maximum Allowable Steady State Power Level (% RTP)" from the Table 3.7.1-1, "Maximum Allowable Linear Power Level-High Trip Setpoints versus OPERABLE MSSVs." The current San Onofre Technical Specifications do not include this data; this power reduction is controlled in accordance with plant specific instructions.

- In LCO 3.7.1, "Main Steam Safety Valves (MSSVs)," delete the column "Allowable Range" from the Table 3.7.1-2, "Main Steam Safety Valves Lift Settings." The current San Onofre Technical Specifications do not include this data; this is redundant with specification of the setpoint and tolerances.
  - 4. In LCO 3.7.1, "Main Steam Safety Valves (MSSVs)," change the wording of SR 3.7.1.1 to "Verify each required MSSV lift setpoint within limits per Table 3.7.1-2 in accordance with the inservice testing program." This is an editorial change only.
  - 5. In LCO 3.7.4, "Atmospheric Dump Valves (ADV)," change the words of Condition C to "Backup nitrogen gas supply system capacity  $\leq$  8 hours for one or more required ADV(s)." This incorporates a comment from the NRC Review Coordinator.
  - 6. In LCO 3.7.4, "Atmospheric Dump Valves (ADV)," change the words of Required Action C to "Restore backup nitrogen gas supply system capacity for one or more required ADV(s)." This incorporates a comment from the NRC Review Coordinator.
  - 7. In LCO 3.7.5, "Auxiliary Feedwater (AFW) System," insert the words "AND 10 days from discovery of failure to meet the LCO" in the Completion Time statements for Condition A and Condition B. This change restores the "flip-flop" aspect of NUREG-1432.
  - 8. Delete LCO 3.7.7.1, "Component Cooling Water (CCW) Safety Related Makeup System," from the proposed SONGS Units 2 and 3 Technical Specifications. Substitute the deleted pages with pages with the statement "Deleted Intentionally." PCN-418 will address the proposed addition of this LCO separately from PCN-299.
  - 9. Surveillance Requirements 3.7.2.1 and 3.7.3.1 are being revised. The words, "...on an actual or simulated actuation signal," should be deleted. These test requirements do not require actuating valve closure from an actual or simulated actuation signal.
- SONGS Units 2 and 3 existing Surveillance Requirement 4.7.1.5 specifies that "Each main steam isolation valve shall be demonstrated OPERABLE by verifying full closure within 8.0 seconds when tested pursuant to Specification 4.0.5." The proposed change described above is consistent with SONGS requirements.
- 10. Surveillance Requirement 3.7.11.1 has been revised to delete the words "on a STAGGERED TEST BASIS," to be consistent with NUREG-1432 and the existing SONGS Technical Specifications.



### Section 3.8

1. In the Actions for LCO 3.8.1, "AC Sources-Operating," add the Second Completion Time for Required Actions A.2 and B.4. This change makes the Completion Times consistent with NUREG-1432.
2. In the Conditions for LCO 3.8.7 (For Unit 3 only), change Condition "C," as submitted in Supplement 2, to Condition "B." Additionally, in the same Condition for Unit 2 only, restore the letter "B" which was inadvertently deleted in supplement 2. These changes correct editorial errors.
3. In LCO 3.8.8, change "Inverters" to "Required inverters." This change is in response to the September 12-13, 1994 NRC proof and review comment.
4. In Condition A for LCO 3.8.9, add the second Completion Time for Required Action A.1. This change makes the Completion Times consistent with NUREG-1432.
5. In Condition B for LCO 3.8.9, change "One AC vital bus inoperable" to "One or more AC vital bus inoperable." This change is in response to the September 12-13, 1994 NRC proof and review comment. Add the Second Completion Time for Required Action B.1. This change makes the Completion Times consistent with NUREG-1432.
6. In Condition C for LCO 3.8.9, change "One DC electrical power distribution subsystem inoperable" to "One or more DC electrical power distribution subsystem inoperable." This change is in response to the September 12-13, 1994 NRC proof and review comment. Add the Second Completion Time for Required Action C.1. This change makes the Completion Times consistent with NUREG-1432.

### Section 3.9

1. In LCO 3.9.3, "Containment Penetrations," modify the wording of LCO 3.9.3.b. The proposed LCO 3.9.3.b statement reads:

"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
- b. the plant is in MODE 6 or defueled configuration, and
- c. with 23 feet of water above the fuel.

-----"  
This change is made for clarity.

2. In LCO 3.9.4, "Shutdown Cooling (SDC) and Coolant Circulation-High Water Level," combine the two Notes in one box and number them sequentially. This is an editorial change only.

#### Section 4.0

1. In Section 4.2.1, "Fuel Assemblies," delete the bracket after the word "components" in the fourth sentence. This is an editorial change only.

#### Section 5.0

1. In Section 5.4, "Technical Specifications (TS) Bases Control," change the reference to the Code of Federal Regulation to "10 CFR 50.71.(e)." This is a correction of a typographical error.
2. In Section 5.7.2, "Special Reports," include the paragraph 5.7.2.a concerning preparation of the post-accident monitoring instrumentation inoperability report. Also, change the alphanumeric numbering of the subsection 5.7.2.a to 5.7.2.b, subsection 5.7.2.b to 5.7.2.c. This incorporates a comment from the NRC Review Coordinator.