

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

|   |   |                       |
|---|---|-----------------------|
| Application of SOUTHERN CALIFORNIA            | ) | Docket No. 50-361     |
| EDISON COMPANY, <u>ET AL.</u> for a Class 103 | ) |                       |
| License to Acquire, Possess, and Use          | ) |                       |
| a Utilization Facility as Part of             | ) | Amendment Application |
| Unit No. 2 of the San Onofre Nuclear          | ) | No. 158               |
| Generating Station                            | ) |                       |

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 158.

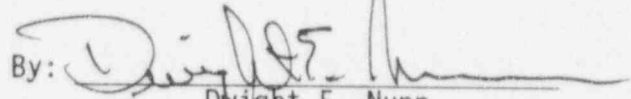
This amendment application consists of Proposed Change Number (PCN)-460 to Facility Operating License No. NPF-10. PCN-460 is a request to revise the Unit 2 Amendment No. 127 approved Technical Specification (TS) 3.6.3, "Containment Isolation Valves," to resolve an inconsistency in the TS. The proposed change will provide Completion Times (CTs) for Sections D.1 and D.2 valves which are consistent with the CTs for the valves in the systems in which they are installed.

Subscribed on this 11th day of April, 1996

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By:



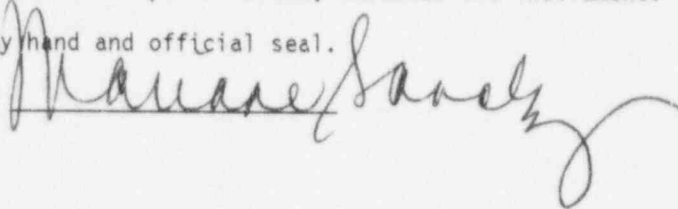
Dwight E. Nunn  
Vice President

State of California  
County of San Diego

On April 11, 1996 before me, Mariane Sanchez,  
personally appeared Dwight E. Nunn, personally known to  
me to be the person whose name is subscribed to the within instrument and  
acknowledged to me that he executed the same in his authorized capacity,  
and that by his signature on the instrument the person, or the entity upon  
behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature



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|---|---|-----------------------|
| Application of SOUTHERN CALIFORNIA            | ) | Docket No. 50-362     |
| EDISON COMPANY, <u>ET AL.</u> for a Class 103 | ) |                       |
| License to Acquire, Possess, and Use          | ) |                       |
| a Utilization Facility as Part of             | ) | Amendment Application |
| Unit No. 3 of the San Onofre Nuclear          | ) | No. 142               |
| Generating Station                            | ) |                       |

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 142.

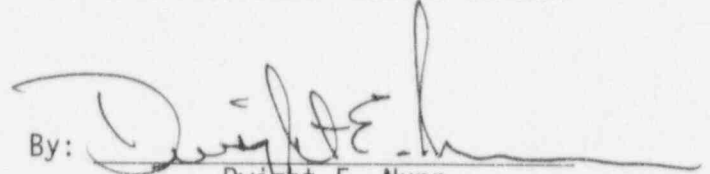
This amendment application consists of Proposed Change Number (PCN)-460 to Facility Operating License No. NPF-15. PCN-460 is a request to revise the Unit 3 Amendment No. 116 approved Technical Specification (TS) 3.6.3, "Containment Isolation Valves," to resolve an inconsistency in the TS. The proposed change will provide Completion Times (CTs) for Sections D.1 and D.2 valves which are consistent with the CTs for the valves in the systems in which they are installed.

Subscribed on this 11th day of April, 1996.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By:

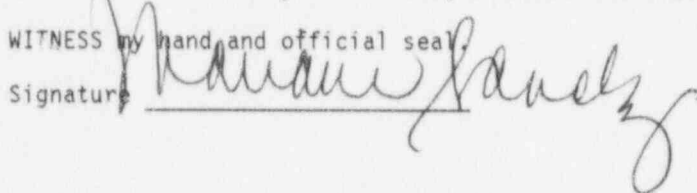
  
Dwight E. Nunn  
Vice President

State of California  
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On April 11, 1996 before me, Mariane Sanchez,  
personally appeared Dwight E. Nunn, personally known to  
me to be the person whose name is subscribed to the within instrument and  
acknowledged to me that he executed the same in his authorized capacity,  
and that by his signature on the instrument the person, or the entity upon  
behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature





## DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGE NPF-10/15-460

This is a request to revise Unit 2 Amendment No. 127 and Unit 3 Amendment No. 116 approved Technical Specification (TS) 3.6.3, "Containment Isolation Valves," for the San Onofre Nuclear Generating Station. Specifically, the Completion Times (CTs) for Sections D.1 and D.2 valves are proposed to be revised to resolve an inconsistency in the TS.

### Amendment Nos. 127 and 116 Approved Specifications

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

### Proposed Specifications

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

### DESCRIPTION

TS 3.6.3, "Containment Isolation Valves," requires that Section D.1 and D.2 valves be secured in their Engineered Safety Feature Actuation Signal (ESFAS) actuated position within 4 hours of becoming inoperable. This requirement is intended to ensure these valves will be able to perform their ESFAS functions. However, the Completion Times (CTs) for these valves in their ESFAS function TSs are considerably longer than the 4 hours allowed in TS 3.6.3. To resolve this inconsistency, Southern California Edison (Edison) proposes to revise TS 3.6.3 to require use of the appropriate CTs for Section D.1 and D.2 valves as follows:

Under the Completion Time for Required Actions E.1 and F.1, change "4 hours" to "In accordance with the applicable LCO pertaining to the valve or system in which it is installed."

This proposed change will restore the CTs for Required Actions E.1 and F.1 to the pre-Amendment Nos. 119 and 108 CTs for D.1 and D.2 valves. There is no change to the Bases for Required Actions E.1 and F.1.

### DISCUSSION

Section D.1 and D.2 valves in TS 3.6.3, "Containment Isolation Valves," provide containment isolation and ESFAS functions. These valves are opened for their ESFAS function and closed for their containment isolation function. Because of this dual function, the appropriate TSs governing the valves or systems in which these valves are required to be operable for ESFAS and TS 3.6.3 are entered simultaneously when they become inoperable. Therefore, it is important that the CTs for the required actions between these TSs are consistently applied.

For example, when one or more High Pressure Safety Injection (HPSI) Section D.1 valve becomes inoperable, both TSs 3.5.2, "ECCS-Operating," and 3.6.3 are entered. TS 3.5.2, which is the TS for the system in which these valves are installed, permits a 72-hour CT to return these valves to operable status. On the other hand, the initial action for containment isolation valve TS 3.6.3 requires that the valves be secured in their ESFAS actuated position within 4 hours after becoming inoperable. Thus, there is an inconsistency in the CTs between these TSs.

This inconsistency between the TSs imposes a very restrictive CT for TS 3.6.3 action and prevents on-line maintenance of these valves. For example, if a valve is placed or fails in its intermediate position during Motor-Operated Valve Actuator Testing, both TSs 3.5.2 and 3.6.3 are applicable. In such a case where more than one action simultaneously applies, the more restrictive 4-hour CT of TS 3.6.3, not the 72-hour CT of TS 3.5.2, must be followed. This could potentially result in a plant shutdown since 4 hours may not be sufficient time for a failed valve to be repaired and returned to operable status.

The inconsistency in the time to take initial action for D.1 and D.2 valves was inadvertently created in Amendment Nos. 119 and 108 due to an oversight in the associated Proposed Change Number (PCN)-430. PCN-430 was a request to revise TS 3.6.3 to add the requirements of Actions E.2 and F.2 based on the results of a Probabilistic Risk Assessment (PRA) which established specific limits on the length of time D.1 and D.2 valves may be placed in their ESFAS actuated positions. The results of the PRA concluded that these time limits would not result in a significant increase in the risk of either core damage frequency or significant radioactive release frequency. The results of the PRA also concluded that the existing CTs for Actions E.1 and F.1 should be maintained in TS 3.6.3. Prior to PCN-430, TS 3.6.3 permitted the CT in Actions E.1 and F.1 for inoperable D.1 and D.2 valves to be in accordance with the systems in which they are installed. However, due to an oversight, PCN-430 replaced this CT requirement with the 4-hour standardized Combustion Engineering Technical Specification CT for containment isolation valves.

Since the 4-hour CT should not apply to D.1 and D.2 valves, this license amendment is requested by Edison to restore the CTs for Section D.1 and D.2 valves to the pre-Amendment 119 and 108 CTs. The proposed change would eliminate this TS inconsistency and reduce the potential for shutdown since the new TS 3.6.3 would require that the inoperable valve follow the CT of the system in which the inoperable valve is installed.

### SAFETY ANALYSIS

The proposed change described above shall be deemed to involve a significant hazards consideration if there is a positive finding in any one of the following areas:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No



The proposed change is intended to ensure consistency in the application of the Completion Times (CTs) for inoperable Section D.1 and D.2 containment isolation valves in Technical Specification (TS) 3.6.3 and the TS governing the system in which these valves are installed. The proposed CT is consistent with the CT for these valves in the existing TSs prior to the issuance of San Onofre Unit 2 Amendment No. 119 and Unit 3 Amendment No. 108 of the existing TSs. These valves were reclassified as Sections D.1 and D.2 valves and provided time limits for the period they could remain secured in their Engineered Safety Feature Actuation Signal actuated positions.

The probability of an accident is unaffected by increasing the CT to be consistent with the CT in the TSs governing the system in which these valves are installed and the consequences of an accident are not affected since no physical change is made and the Safety Analysis remains unaffected. Therefore, operation of the facility in accordance with this change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change does not influence the possibility of a new or different accident previously evaluated because no physical change is made and the Safety Analysis is not affected. Therefore, operation of the facility in accordance with this proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

Response: No

The margin of safety is unaffected since this proposed change is consistent with the CTs in the TSs governing the system in which these valves are installed. Therefore, this proposed change will not involve a significant reduction in a margin of safety.

#### Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: 1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92 and 2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change. Moreover, because this action does not involve a significant hazards consideration, it will also not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

ATTACHMENT "A"

AMENDMENT NO. 127 APPROVED SPECIFICATIONS  
UNIT 2