



SOUTHERN CALIFORNIA  
**EDISON**

An EDISON INTERNATIONAL Company

Dwight E. Nunn  
Vice President

May 29, 1996

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

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**  
**ESF Timer Technical Specification Change**  
**Proposed Technical Specification Change NPF-10/15-454**  
**San Onofre Nuclear Generating Station**  
**Units 2 and 3**

Enclosed are Amendment Application Numbers 156 and 140 to Facility Operating Licenses NPF-10 and NPF-15 for San Onofre Nuclear Generating Station Units 2 and 3, respectively. The Amendment Applications consist of Proposed Technical Specification Change Number NPF-10/15-454 (PCN-454). PCN-454 is provided as Enclosure 1 to this letter.

The proposed change is to revise the acceptance criteria for the Agastat time delay relays used in the Engineered Safety Features (ESF) load sequencer in Surveillance Requirement (SR) 3.8.1.18, "A.C. Sources - Operating" of Technical Specification (TS) 3.8.1, "A.C. Sources - Operating." Surveillance Requirement 3.8.1.18 requires that each automatic load sequence timer operates within  $\pm 10\%$  of its design interval.

The manufacturer's stated accuracy for the Agastat time delay relays used to sequence ESF loads is  $\pm 10\%$  of setting. The current TS requirement of  $\pm 10\%$  of interval is more restrictive and has resulted in many recorded test failures, when actual system performance was acceptable. Edison has performed analyses that demonstrate that the wider tolerance is acceptable.

This proposed change also resolves issues raised by the NRC in Inspection Report Nos. 50-361/95-04 and 50-362/95-04. Edison received a Notice Of Violation (NOV) resulting from these inspections involving failure to take prompt corrective actions related to deficiencies with Agastat relays. In response to that NOV, Edison stated its intent to submit a Technical Specification change prior to the Cycle 9 refueling outages. This proposed change fulfills that commitment. In order to implement this change in the Cycle 9 refueling outages, Edison requests NRC approval of this license amendment request by December 1, 1996.

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P. O. Box 128  
San Clemente, CA 92672  
714-368-1480

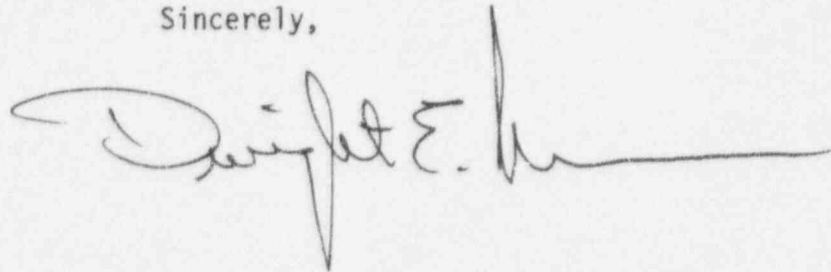
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This amendment request is expected to result in savings in excess of \$100,000 for the two units over the lifetime of the plant. This savings is based on added costs involved in previous test failures experienced during surveillance testing using the present acceptance criteria. These test failures resulted in subsequent non-conformance reports (NCRs) and retesting even though the system performance was acceptable. Because of this savings, this submittal is being submitted as a Cost Beneficial Licensing Action (CBLA).

Edison requests this amendment be issued effective as of its date of issuance, to be implemented within 30 days from the date of issuance. This will provide adequate time for the necessary procedure changes and training on the new Technical Specifications.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Dwight E. H.", with a long horizontal flourish extending to the right.

Enclosures

cc: L. J. Callan, Regional Administrator, NRC Region IV  
J. E. Dyer, 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 2 and 3  
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3  
H. Kocol, California Department of Health Services