UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. for a Class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 2 of the San Onofre Nuclear Generating Station	)	Docket No. 50-361 Amendment Application No. 159.

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 159.

This amendment application consists of Proposed Technical Specification Change No. NPF-10-466 to Facility Operating License NPF-10. Proposed Technical Specification Change No. NPF-10-466 is a request to revise License Condition 2.C.(19)b, "Shift Manning," Technical Specification (TS) 3.3.1, "Reactor Protective Instrumentation--Operating," TS 3.3.8, "Containment Purge Isolation Signal (CPIS)," TS 3.3.10, "Fuel Handling Isolation Signal (FHIS)," TS 3.3.11, "Post Accident Monitoring Instrumentation (PAMI)," TS 3.4.7, "RCS Loops--Mode 5, Loops Filled," TS 3.9.6, "Refueling Water Level," and TS 5.5.2.13, "Diesel Fuel Oil Testing Program," approved by NRC Amendment No. 127.

The proposed change would delete the license condition related to shift manning requirements as they are adequately addressed in the Administrative Controls section, remove exclusion of the power range source channel from the 92 day channel functional test, revise the limit specified in Surveillance Requirements (SRs) 3.3.8.2 and 3.3.8.3 for the Containment Gaseous Monitor from two times background to its current limit, revise the limit specified in SR 3.3.10.2 for the required FHIS monitor from less than or equal to 6E4 above background to its current limit, correct the number of instruments required to

measure Reactor Coolant Inlet Temperature (T_{Cold}) per loop, and Reactor Coolant Outlet Temperature (T_{Hot}) per loop, from two per loop, to two, revise the limit specified in SR 3.4.7.2 to remove the equality from the limit of the secondary side water level, revise the applicability of TS 3.9.6 and include a clarifying note, and revise criteria for diesel fuel oil testing.

The changes to delete License Condition 2.C.(19)b, "Shift Manning," and to revise TS 3/4.4.1.4.1, "Cold Shutdown--Loops Filled," would revise existing Technical Specification requirements and are for clarity.

The remaining provisions are contained in the current Technical Specifications, TS 3/4.3.1, "Reactor Protective Instrumentation," TS 3/4.3.2, "Engineered Safety Feature Actuation System Instrumentation," TS 3/4.3.3.6, "Accident Monitoring Instrumentation," TS 3/4.9.10, "Water Level - Reactor Vessel," and TS 3/4.8.1.1, "A.C. Sources."

Subscribed on this 31st day of May, 1996.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Dwight E. Nunn

Dwight E. Nunn
Vice President

State of California
County of San Diego
On 5/31/96 before me, Mariane Sanchez, personally appeared Dwight E. Nunn, personally known to me ~~(or proved to me on the basis of satisfactory evidence)~~ to be the person(s) whose name(s) is/~~are~~ subscribed to the within instrument and acknowledged to me that he/~~she/they~~ executed the same in his/~~her/their~~ authorized capacity(~~ies~~), and that by his/~~her/their~~ signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature Mariane Sanchez

MARIANE SANCHEZ
COMM. # 1033763
Notary Public — California
ORANGE COUNTY
My Comm. Expires OCT 14, 1998

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. for a Class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 3 of the San Onofre Nuclear Generating Station	)	Docket No. 50-362 Amendment Application No. 143.

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 143.

This amendment application consists of Proposed Technical Specification Change No. NPF-15-466 to Facility Operating License NPF-15. Proposed Technical Specification Change No. NPF-15-466 is a request to revise Technical Specification (TS) 3.3.1, "Reactor Protective Instrumentation--Operating," TS 3.3.8, "Containment Purge Isolation Signal (CPIS)," TS 3.3.10, "Fuel Handling Isolation Signal (FHIS)," TS 3.3.11, "Post Accident Monitoring Instrumentation (PAMI)," TS 3.4.7, "RCS Loops--Mode 5, Loops Filled," TS 3.9.6, "Refueling Water Level," and TS 5.5.2.13, "Diesel Fuel Oil Testing Program," approved by NRC Amendment No. 116.

The proposed change would remove exclusion of the power range source channel from the 92 day channel functional test, revise the limit specified in Surveillance Requirements (SRs) 3.3.8.2 and 3.3.8.3 for the Containment Gaseous Monitor from two times background to its current limit, revise the limit specified in SR 3.3.10.2 for the required FHIS monitor from less than or equal to 6E4 above background to its current limit, correct the number of instruments required to measure Reactor Coolant Inlet Temperature (T_{Cold}) per loop, and Reactor Coolant Outlet Temperature (T_{Hot}) per loop, from two per

loop, to two, revise the limit specified in SR 3.4.7.2 to remove the equality from the limit of the secondary side water level, revise the applicability of TS 3.9.6 and include a clarifying note, and revise criteria for diesel fuel oil testing.

The change to TS 3/4.4.1.4.1, "Cold Shutdown--Loops Filled," would revise existing Technical Specification requirements and is for clarity.

The remaining provisions are contained in the current Technical Specifications, 3/4.3.1, "Reactor Protective Instrumentation," 3/4.3.2, "Engineered Safety Feature Actuation System Instrumentation," 3/4.3.3.6, "Accident Monitoring Instrumentation," 3/4.9.10, "Water Level - Reactor Vessel," and TS 3/4.8.1.1, "A.C. Sources."

Subscribed on this 31st day of May, 1996.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: _____
Dwight E. Nunn
Vice President

State of California
County of San Diego
On 5/31/96 before me, Mariane Sanchez, personally appeared Dwight E. Nunn, personally known to me ~~(or proved to me on the basis of satisfactory evidence)~~ to be the person(s) whose name(s) is/~~are~~ subscribed to the within instrument and acknowledged to me that he/~~she/they~~ executed the same in his/her/their authorized capacity(~~ies~~), and that by his/~~her/their~~ signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature _____

MARIANE SANCHEZ
COMM. # 1033763
Notary Public — California
ORANGE COUNTY
My Comm. Expires OCT 14, 1998

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGE NPF-10/15-466

This is a request to revise License Condition 2.C.(19)b, "Shift Manning," for San Onofre Nuclear Generating Station (SONGS) Unit 2, and Technical Specifications 3.3.1, "Reactor Protective Instrumentation--Operating," 3.3.8, "Containment Purge Isolation Signal (CPIS)," 3.3.10, "Fuel Handling Isolation Signal (FHIS)," 3.3.11, "Post Accident Monitoring Instrumentation (PAMI)," 3.4.7, "RCS Loops--Mode 5, Loops Filled," 3.9.6, "Refueling Water Level," and 5.5.2.13, "Diesel Fuel Oil Testing Program," for SONGS Units 2 and 3.

Technical Specifications 3.3.1, 3.3.8, 3.3.10, 3.3.11, 3.4.7, 3.9.6, and 5.5.2.13 were approved by NRC Amendment Nos. 127 and 116.

Existing SONGS Specifications:

Unit 2: See Attachment "A"

Unit 3: See Attachment "B"

Proposed SONGS Specifications:

Unit 2: See Attachment "C"

Unit 3: See Attachment "D"

Description of Changes

Summary

Proposed Technical Specification Change Number NPF-10/15-466 (PCN-466) addresses modifications to the Technical Specifications for the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 approved by NRC Amendment Nos. 127 and 116. NRC Amendment Nos. 127 and 116 approved a license amendment request that adopted the recommendations of NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," requested through Proposed Technical Specification Change Number NPF-10/15-299 (PCN-299).

PCN-466 would delete License Condition 2.C.(19)b, "Shift Manning," for SONGS Unit 2, and revise Technical Specification (TS) 3.3.1, "Reactor Protective Instrumentation--Operating," TS 3.3.8, "Containment Purge Isolation Signal (CPIS)," TS 3.3.10, "Fuel Handling Isolation Signal (FHIS)," TS 3.3.11, "Post Accident Monitoring Instrumentation (PAMI)," TS 3.4.7, "RCS Loops--Mode 5, Loops Filled," TS 3.9.6, "Refueling Water Level," and TS 5.5.2.13, "Diesel Fuel Oil Testing Program," for SONGS Units 2 and 3.

The proposed change is required to restore certain provisions of the current Technical Specifications that were not incorporated in PCN-299. The change to License Condition 2.C.(19)b and TS 3.4.7, however, are being made for clarity, as they revise existing current Technical Specification requirements. These

changes were identified during preparation of the procedure changes necessary to implement NRC Amendment Nos. 127 and 116.

Specifically, the proposed change would delete SONGS Unit 2 License Condition 2.C.(19)b as it is addressed in the Administrative Controls section. The proposed change would also remove exclusion of the power range source channel from the 92 day channel functional test. Setpoint allowable values specified in Surveillance Requirements (SRs) 3.3.8.2, and 3.3.8.3 for the Containment Gaseous Monitor, and specified in SR 3.3.10.2 for the required FHIS monitor, will be revised back to their current limit. The number of instruments required to measure Reactor Coolant Inlet Temperature (T_{Cold}) per loop, and Reactor Coolant Outlet Temperature (T_{Hot}) per loop, will be revised from two per loop, to two. The limit specified in SR 3.4.7.2 will be revised to make it consistent with LCO 3.4.7, the applicability of TS 3.9.6 would be revised, a clarifying note to LCO 3.9.6 would be included, and SR 3.9.6.1 would be revised consistent with these changes, and criteria for diesel fuel oil testing requirements would be revised.

Discussion

Through Proposed Technical Specification Change No. NPF-10/15-299 (PCN-299), changes to the SONGS Units 2 and 3 Technical Specifications were proposed that would adopt the recommendations of NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants." These changes included incorporating the revised format of the NUREG, including allowances granted by NUREG-1432, plant specific differences, and to a limited degree, changes to reflect plant specific enhancements. Mainly, the SONGS Units 2 and 3 Technical Specifications were directly transcribed in PCN-299. NRC Amendment Nos. 127 and 116, dated February 9, 1996, approved the changes proposed through PCN-299.

Proposed Technical Specification Change Number NPF-10/15-466 (PCN-466) addresses modifications to the SONGS Units 2 and 3 Technical Specifications approved by NRC Amendment Nos. 127 and 116, and also addresses changes to existing requirements of the Technical Specifications. During preparation of the procedure changes necessary to implement NRC Amendment Nos. 127 and 116, certain changes required to implement these amendments were identified. The proposed changes discussed herein would restore particular provisions of the SONGS Units 2 and 3 Technical Specifications that were not incorporated in PCN-299.

Changes are proposed that would revise: a) License Condition 2.C.(19)b, "Shift Manning," for SONGS Unit 2, b) Technical Specification (TS) 3.3.1, "Reactor Protective Instrumentation--Operating," c) TS 3.3.8, "Containment Purge Isolation Signal (CPIS)," d) TS 3.3.10, "Fuel Handling Isolation Signal (FHIS)," e) TS 3.3.11, "Post Accident Monitoring Instrumentation (PAMI)," f) TS 3.4.7, "RCS Loops--Mode 5, Loops Filled," g) TS 3.9.6, "Refueling Water Level," and h) TS 5.5.2.13, "Diesel Fuel Oil Testing Program." The change to SONGS Unit 2 License Condition 2.C.(19)b, "Shift Manning," and TS 3.4.7 are for clarity and would revise requirements of the existing Technical Specifications.

The following discussion describes the proposed changes.

a) The proposed change would delete License Condition 2.C.(19)b, "Shift Manning," for SONGS Unit 2. Under the revised Technical Specifications, the overtime restrictions identified in License Condition 2.C.(19)b conflict with the provisions of the revised Administrative Controls section. This conflict is only applicable to SONGS Unit 2 because the license condition is specific to SONGS Unit 2. For SONGS Unit 3, the shift manning requirements are included in the existing Administrative Controls section. This change is for clarity and would revise requirements of the existing Technical Specifications.

b) The proposed change would revise TS 3.3.1. TS 3.3.1 is required to initiate a reactor trip to protect against violating the core specified acceptable fuel design limits and breaching the reactor coolant pressure boundary during anticipated operational occurrences.

The current Technical Specification is 3/4.3.1, "Reactor Protective Instrumentation." TS 3/4.3.1 similarly ensures that the overall reliability, redundancy, and diversity assumed available in the facility design for the protection and mitigation of accident and transient conditions. TS 3/4.3.1 requires that a surveillance be performed (Surveillance Requirement 4.3.1.1) for each reactor protective instrumentation channel to demonstrate channel operability by a channel check, channel calibration, and channel functional test at specific frequencies.

Through PCN-299, the portion of Surveillance Requirement (SR) 4.3.1.1 related to the channel functional test of the power range neutron flux channel, was moved to SR 3.3.1.7. SR 3.3.1.7 requires that the channel functional test be performed every 92 days for each reactor protective channel, with the exception of power range neutron flux. The channel functional test is required to be performed for power range neutron flux to satisfy assumptions made in the design basis to permit refueling outage surveillances for this equipment at 24 month intervals. The proposed change would restore the power range neutron flux 92 day surveillance eliminating this exception.

c) The proposed change would revise TS 3.3.8, "Containment Purge Isolation Signal (CPIS)." TS 3.3.8 provides protection from radioactive contamination in the containment in the event a fuel assembly should be severely damaged during handling. The CPIS also closes the containment purge valves during plant operation in response to a reactor coolant system leak.

The requirements for CPIS are currently contained in TS 3/4.3.2, "Engineered Safety Feature Actuation System Instrumentation," and TS 3/4.3.3, "Radiation Monitoring Instrumentation." These Specifications ensure the operability of the radiation monitor channels. A channel functional test is required to verify that the setpoint is set sufficiently high to prevent spurious alarms/trips, yet sufficiently low to ensure an alarm/trip should an inadvertent release occur.

Through PCN-299, this requirement was moved to SR 3.3.8.2 and SR 3.3.8.3. These surveillances require that the channel functional test be performed to verify that the setpoints are less than or equal to two times background based on a transcription of the words in NUREG-1432. However, at this level, during startup, for example, startup from a plant trip, this setpoint would be routinely exceeded. The existing setpoint satisfies the current Technical Specification, but cannot satisfy the specification inadvertently directly transcribed from NUREG-1432. The proposed change would restore the setpoint for the Containment Gaseous Monitor to "sufficiently high to prevent spurious alarms/trips, yet sufficiently low to ensure an alarm/trip should an inadvertent release occur." This is consistent with the requirements of the existing Technical Specifications.

d) The proposed change would revise TS 3.3.10, "Fuel Handling Isolation Signal (FHIS)." TS 3.3.10 provides protection from radioactive contamination in the spent fuel pool area in the event that a spent fuel element ruptures during handling.

The requirements for FHIS are currently contained in TS 3/4.3.2, "Engineered Safety Feature Actuation System Instrumentation." TS 3/4.3.2 ensures the operability of the FHIS channels. A channel functional test is required to verify that the trip setpoint is set sufficiently high to prevent spurious alarms/trips, yet sufficiently low to ensure an alarm/trip should a fuel handling accident occur.

Through PCN-299, this surveillance was moved to SR 3.3.10.2. This SR requires that a channel functional test be performed to verify that the setpoint is less than or equal to 6E4 cpm above background based on a transcription of the words in NUREG-1432. However, at this level, this setpoint would be routinely exceeded. The existing setpoint satisfies the current Technical Specification, but cannot satisfy the specification inadvertently directly transcribed from NUREG-1432. The proposed change would restore the setpoint to "sufficiently high to prevent spurious alarms/trips, yet sufficiently low to ensure an alarm/trip should a fuel handling accident occur." This is consistent with the requirements of the existing Technical Specifications.

e) The proposed change would revise TS 3.3.11, "Post Accident Monitoring Instrumentation (PAMI)." TS 3.3.11 is required to ensure that necessary plant parameters are displayed that provide information required by the control room operators during postulated accident conditions. TS 3.3.11 requires operability of Regulatory Guide 1.97 Type A variables and Category I, non-Type A variables.

The NUREG-1432 technical specifications differ from the current SONGS Units 2 and 3 Technical Specifications in that the NUREG identifies two channels of Reactor Coolant Inlet Temperature (T_{Cold}) per loop, and two channels of Reactor Coolant Outlet Temperature (T_{Hot}) per loop. NUREG-1432 also specifies that TS 3.3.11 include Regulatory Guide 1.97 Type A variables and Category I, non-Type A variables.

Under the current Technical Specifications for SONGS Units 2 and 3, TS 3/4.3.3.6, "Accident Monitoring Instrumentation," requires operability of two channels of Reactor Coolant Inlet Temperature (T_{Cold}) and two channels of Reactor Coolant Outlet Temperature (T_{Hot}). Therefore, there was an unintentional increase in the number of instruments required. The currently installed instrumentation satisfies the current Technical Specification, but cannot satisfy the specification inadvertently directly transcribed from NUREG-1432.

The SONGS requirements for PAMI are based on analyses performed to support Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant Environs Conditions During and Following an Accident," Revision 2, 1980. SONGS Units 2 and 3 satisfies the intent of this regulatory guide with certain exceptions approved by the NRC in the May 26, 1987 letter, "Safety Evaluation for Conformance to Regulatory Guide 1.97." T_{Cold} and T_{Hot} are identified as plant specific parameters considered Type A variables. SCE identified that the instrumentation to measure these parameters deviates from the regulatory guide in that the measurement range is 50°F to 710°F rather than the specified range of 50°F to 750°F. By letter dated May 26, 1987, this was found acceptable by the NRC in their Safety Evaluation for Conformance to Regulatory Guide 1.97.

f) The proposed change would revise TS 3.4.7, "RCS Loops--Mode 5, Loops Filled." TS 3.4.7 requires at least one of the Shutdown Cooling trains or Reactor Coolant System (RCS) loops to be operable, thus ensuring the necessary circulation in the RCS. LCO 3.4.7 specifies that the secondary side water level of each steam generator be greater than 50% (wide range). However, SR 3.4.7.2 verifies that the required steam generator secondary side water level is greater than or equal to 50% (wide range). There is an inconsistency between what is specified in the LCO, and what is required to be verified by the surveillance requirement.

The current Specification, TS 3/4.4.1.4.1, "Cold Shutdown--Loops Filled," contains the same inconsistency between the LCO and surveillance requirement as TS 3.4.7. The proposed change would conservatively remove the inconsistency by revising SR 3.4.7.2 to specify that the required steam generator secondary side water level be verified greater than 50% (wide range). The change to the limit, from 10% (TS 3/4.4.1.4.1) to 50% (TS 3.4.7), was made as part of the TSIP submittal and would be unchanged. This change is for clarity and would revise requirements of the existing Technical Specifications.

g) The proposed change would revise TS 3.9.6, "Refueling Water Level." TS 3.9.6 requires a minimum refueling water level of 23 feet above the reactor vessel flange, thus ensuring that the radiological consequences of a postulated fuel handling accident inside the containment, are within acceptable limits. The Specification is required during core alterations, except during latching and unlatching of control rod drive shafts and during movement of irradiated fuel assemblies within containment.

The current Specification, TS 3/4.9.10, "Water Level--Reactor Vessel," similarly requires that at least 23 feet of water be maintained over the top of the reactor pressure vessel flange. TS 3/4.9.10 is applicable during movement of fuel assemblies or CEAs within the reactor pressure vessel when either the fuel assemblies being moved or the fuel assemblies seated within the reactor pressure vessel are irradiated. A footnote clarifies that the water level may be lowered to a minimum of 23 feet above the top of the fuel for movement of four finger CEAs, coupling and uncoupling of CEA extension shafts, or for verifying the coupling and uncoupling. However, the footnote was not included in TS 3.9.6 because it was believed to be adequately addressed.

The proposed change would restore the footnote as it is not clearly addressed by TS 3.9.6. Specifically, a note would be added to modify LCO 3.9.6 to clearly allow that the refueling water level may be lowered to a minimum of 23 feet above the top of the fuel for movement of four finger CEAs, coupling and uncoupling of CEA extension shafts, or for verifying the coupling and uncoupling. The proposed change would also revise the applicability of TS 3.9.6. The change would replace the portion of the applicability related to core alterations with the phrase "During movement of fuel assemblies or CEAs within the reactor pressure vessel when either the fuel assemblies being moved or the fuel assemblies seated within the reactor pressure vessel are irradiated." This change similarly restores provisions of the existing Technical Specification. SR 3.9.6.1 would then be revised to state "The refueling water level shall be determined to be at least its minimum required depth." This change is required for consistency with the LCO.

h) Lastly, the proposed change would revise TS 5.5.2.13, "Diesel Fuel Oil Testing Program." TS 5.5.2.13 is the diesel fuel oil testing program required by SR 3.8.3.3 of TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air." Section 5.5.2.13.a of the program includes various sampling and testing requirements, to be performed at least once every 92 days, and from new fuel oil prior to addition to the storage tanks. One of the tests verifies the kinematic viscosity. The limit specified in 5.5.2.13.a, is "greater than or equal to 4.1." The Bases for SR 3.8.3, however, specifies a limit of "greater than or equal to 1.9, but less than or equal to 4.1." The 92 day test, is not included. The proposed change would eliminate the 92 day frequency and revise the viscosity limit specified in the Administrative Controls to be consistent with the Bases to SR 3.8.3.3. Also, a typographical error in paragraph b is corrected. The ASTM standard for sampling fuel oil is restored to ASTM-D4057-81.

Requirements for diesel fuel oil testing are currently included in SR 4.8.1.1.2.c of TS 3/4.8.1.1, "A.C. Sources." TS 3/4.8.1.1 requires operability of the A.C. power sources to ensure that sufficient power will be available to supply safety related equipment required for safe shutdown and the mitigation and control of accident conditions. The SR requires verification of the kinematic viscosity of the sample as "greater than or equal to 1.9, but less than or equal to 4.1."

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 any accident previously evaluated?

   Response: No

   Proposed Technical Specification Change Number NPF-10/15-466 (PCN-466) addresses modifications to the Technical Specifications for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 approved by NRC Amendment Nos. 127 and 116. NRC Amendment Nos. 127 and 116 approved changes to adopt the recommendations of NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," requested through Proposed Technical Specification Change Number NPF-10/15-299 (PCN-299). The proposed changes were identified during drafting of the procedure changes required to implement NRC Amendment Nos. 127 and 116.

   PCN-466 is required to restore certain provisions of the current Technical Specifications that were not incorporated in Amendment Nos. 127 and 116. Changes are proposed that would revise Technical Specification (TS) 3.3.1, "Reactor Protective Instrumentation--Operating," TS 3.3.8, "Containment Purge Isolation Signal (CPIS)," TS 3.3.10, "Fuel Handling Isolation Signal (FHIS)," TS 3.3.11, "Post Accident Monitoring Instrumentation (PAMI)," TS 3.9.6, "Refueling Water Level," and TS 5.5.2.13, "Diesel Fuel Oil Testing Program."

   Specifically, the proposed change removes exclusion of the power range source channel from the 92 day channel functional test, revises the limit specified in Surveillance Requirements 3.3.8.2 and 3.3.8.3 for the Containment Gaseous Monitor from two times background to its current limit, revises the limit specified in SR 3.3.10.2 for the required FHIS monitor from less than or equal to 6E4 above background to its current limit, corrects the number of instruments required to measure T_{Cold} and T_{Hot} from two per loop to two, revises the applicability of TS 3.9.6, includes a clarifying note, and revises SR 3.9.6.1 for consistency, and revises diesel fuel oil testing requirements.

   These provisions are contained in the current Technical Specifications, TS 3/4.3.1, "Reactor Protective Instrumentation," TS 3/4.3.2, "Engineered Safety Feature Actuation System Instrumentation," TS 3/4.3.3.6, "Accident Monitoring Instrumentation," TS 3/4.9.10, "Water Level--Reactor Vessel," and TS 3/4.8.1.1, "A.C. Sources."

PCN-466 would also revise requirements of the existing Technical Specification. The proposed change will revise SONGS Unit 2 License Condition 2.C.(19)b, "Shift Manning," and TS 3.4.7, "RCS Loops--Mode 5, Loops Filled."

Currently, shift manning requirements are contained in License Condition 2.C.(19)b for SONGS Unit 2, and contained in the Administrative Controls section for SONGS Unit 3. Through NRC Amendment Nos. 127 and 116, the shift manning requirements were revised identically and included in the revised Administrative controls section. Retaining a separate license condition provides no function and is inconsistent with the administrative controls, therefore, it would be deleted.

The proposed change to TS 3.4.7 would revise Surveillance Requirement 3.3.7.2. The change would remove an inconsistency between what is specified in the LCO, and what is required to be verified by the surveillance requirement. The proposed change conservatively removes the inconsistency by revising SR 3.4.7.2 to specify that the required steam generator secondary side water level be verified greater than 50% (wide range). This change is for clarity and would revise requirements of the existing Technical Specifications, TS 3/4.4.1.4.1, "Cold Shutdown--Loops Filled,"

Operation of the facility would remain unchanged as a result of the proposed changes. Therefore, the proposed change will not involve a significant increase in the probability or consequences of any 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 previously evaluated?

Response: No

The proposed change will restore provisions of the current Technical Specifications for SONGS Units 2 and 3. The proposed change would remove the exclusion of the power range source channel from the 92 day channel functional tests, revise the limit specified in Surveillance Requirements 3.3.8.2 and 3.3.8.3 for the Containment Gaseous Monitor from two times background to its current limit, revise the setpoint of the required FHIS monitor from less than or equal to 6E4 above background to its current limit, correct the number of instruments required to measure T_{Cold} and T_{Hot} from two per loop to two, revise the applicability of TS 3.9.6, include a clarifying note, and revise SR 3.9.6.1 for consistency, and revise diesel fuel oil testing requirements.

The proposed change would also revise existing requirements. The change to License Condition 2.C.(19)b, "Shift Manning," for SONGS Unit 2, would delete the license condition as it is included in

the revised Administrative Controls section. The change to TS 3.4.7, would remove an inconsistency between the LCO and surveillance requirements.

Operation of the facility would remain unchanged as a result of the proposed change. Therefore, the 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 proposed change will restore provisions of the current Technical Specifications for SONGS Units 2 and 3 and make certain changes for clarity. Operation of the facility would remain unchanged as a result of the proposed change. Therefore, the 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.