



SOUTHERN CALIFORNIA  
**EDISON**

An EDISON INTERNATIONAL Company

Dwight E. Nunn  
Vice President

January 24, 1997

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

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**  
**Proposed Technical Specification Change Number 477**  
**San Onofre Nuclear Generating Station**  
**Units 2 and 3**

- References: (1) Letter, Mel B. Fields (NRC) to Harold B. Ray (SCE), Subject: "Issuance of Amendment for San Onofre Nuclear Generating Station, Unit No. 2 (TAC No. M86191) and Unit No.3 (TAC No. M86192)," dated February 9, 1996
- (2) NUREG-1432, Standard Technical Specifications, Combustion Engineering Plants (CEOG STS), September, 1992
- (3) Letter, J.L. Rainsberry to U.S. Nuclear Regulatory Commission, Document Control Desk, Subject: "Diesel Generator Testing," San Onofre Nuclear Generating Station, Unit2 2 and 3, dated January 12, 1997

Enclosed is Amendment Application Numbers 166 and 151 to Facility Operating Licenses NPF-10 and NPF-15, respectively, for the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. The Amendment Application consists of Proposed Technical Specification Change Number 477 (PCN-477).

The proposed change is requested to revise Surveillance Requirement (SR) 3.8.1.9 to Technical Specification 3.8.1, "AC Sources - Operating." This change will revise the SR to more accurately reflect safety analysis conditions. NRC Amendment Nos. 127 and 116 (Reference 1) approved changes to the SONGS Units 2 and 3 Technical Specifications that adopted the recommendations of NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," Reference 2, submitted as part of Proposed Technical

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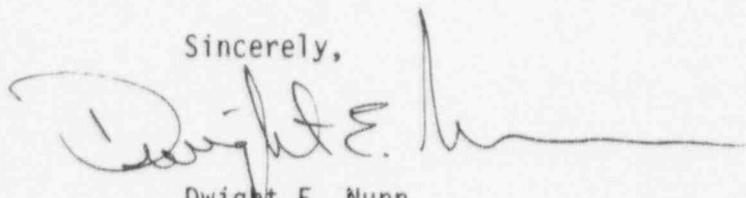
Specification Change Number 299 (PCN-299) with exceptions as noted and discussed. A re-review of this implementation revealed the need for this change, as described in Reference 3.

As has been discussed with NRC Project Manager, M.B. Fields, further proposed changes to TS 3.8 are anticipated. We will submit any further change requests identified by this re-review to the NRC by February 21, 1997.

The Southern California Edison Company requests this amendment be issued effective as of its date of issuance, to be implemented on Unit 2 within 30 days from the date of issuance, and on Unit 3 prior to return from the Cycle 9 refueling outage.

If you would like additional information regarding this Amendment Application, please let me know.

Sincerely,

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

Dwight E. Nunn  
Vice President  
Engineering and Technical Services

Enclosure

cc: L. J. Callan, Regional Administrator, 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 & 3  
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3

**DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE 477**

This is a request for a Technical Specification (TS) change to revise Surveillance Requirement (SR) 3.8.1.9 in TS 3.8.1, "AC Sources -Operating," for SONGS Units 2 and 3.

**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**

The proposed change is requested to revise elements of the diesel generator surveillances to more clearly reflect the testing as it is performed, to be in greater agreement with the Standard Technical Specifications. This change is needed due to an ongoing effort to re-review the Surveillance Requirements (SRs) following their revision as part of NRC Amendment Nos. 127 and 116, for SONGS Units 2 and 3. NRC Amendment Nos. 127 and 116 approved changes to the SONGS Units 2 and 3 Technical Specifications that adopted the recommendations of NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," submitted as part of Proposed Technical Specification Change Number 299 (PCN-299) with exceptions as noted and discussed. This was performed as part of the San Onofre participation as the lead plant for the Combustion Engineering Owners Group (CEOG) in the Technical Specification Improvement Program (TSIP).

The proposed change would revise SR 3.8.1.9 to more clearly reflect testing conditions and be in greater agreement with NUREG 1432, Rev. 1.

## Discussion

Through PCN-299, changes to the SONGS Units 2 and 3 Technical Specifications were proposed that adopted 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. This included modifications to the test conditions of SR 3.8.1.9 as approved by the NRC.

SR 3.8.1.9 is revised to match the text of the NUREG 1432, Revision 1. This change clarifies the conditions under which the DG single load rejection test is performed.

This SR is also revised to provide more limiting Voltage and Frequency limits for recovery from the transient caused by the load rejection (acceptance criteria b and c).

The lower Voltage limit is changed to 4297 V. This is the Voltage that the EDG must achieve to reset the 4.16 kV Engineered Safety Features (ESF) bus undervoltage relays to allow ESF load sequencing to proceed. Undervoltage relay reset is a permissive that must be satisfied to initiate the ESF load sequence timers when an ESF actuation signal is present. The upper voltage limit is changed to 4576 V to be consistent with the maximum allowable steady state voltage for 4.16 kV motors (110% of 4160 V). The previous Voltage limits were based on EDG run conditions of 4360V  $\pm 10\%$ , per NUREG 1432, Rev. 0.

The lower frequency limit is changed from 58.8 Hz to 59.7 Hz. The lower frequency limit is equal to  $-0.5\%$  of the 60 Hz nominal frequency and is based on maintaining acceptable High Pressure Safety Injection system performance as assumed in the accident analyses. The previous Frequency limits were based on acceptable EDG run conditions of 60 Hz  $\pm 2\%$  per NUREG 1432, Rev. 0.

Consequently, the Voltage and Frequency limits are made tighter, to ensure the EDG continues to function as assumed in the SONGS accident analysis.

Also attached, for information in this proposed change review, is the draft proposed Bases change which will be processed with this TS change.

## 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

The proposed change would revise Surveillance Requirement (SR) 3.8.1.9 to more clearly reflect test conditions and be in greater agreement with NUREG 1432.

The Voltage and Frequency limits are made tighter, to accurately reflect plant design requirements. Discussion regarding reactive power loading is eliminated from the SR, consistent with the wording of NUREG 1432, Rev. 1, and added to the Bases.

Operation of the facility would remain unchanged as a result of the proposed changes and no assumptions or results of any accident analyses are affected. 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 would revise Surveillance Requirement (SR) 3.8.1.9 to more clearly reflect test conditions and be in greater agreement with NUREG 1432.

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 would revise Surveillance Requirement (SR) 3.8.1.9 to more clearly reflect test conditions and be in greater agreement with NUREG 1432. The Voltage and Frequency limits are made more restrictive, to accurately reflect the assumptions made in the SONGS accident analysis. Consequently, no reduction in any margin to safety exists.

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.