

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA)	
EDISON COMPANY, <u>ET AL.</u> for a Class 103)	Docket No. 50-361
License to Acquire, Possess, and Use)	
a Utilization Facility as Part of)	Amendment Application
Unit No. 2 of the San Onofre Nuclear)	No. 167
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 167.

This amendment application consists of Proposed Change Number (PCN)-483 to Facility Operating License NPF-10. PCN 483 is a request to revise Surveillance Requirement (SR) 3.8.1.8 and applicable Bases to Technical Specification (TS) 3.8.1, "AC Sources - Operating."

The proposed change allows Edison to credit overlap testing for performance of SR 3.8.1.8.

Subscribed on this 15th day of April, 1997.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By:

Dwight E. Nunn
Vice President

State of California

County of San Diego

On 4/15/97 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 Mariane Sanchez



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Application of SOUTHERN CALIFORNIA)	
EDISON COMPANY, <u>ET AL.</u> for a Class 103)	Docket No. 50-361
License to Acquire, Possess, and Use)	
a Utilization Facility as Part of)	Amendment Application
Unit No. 3 of the San Onofre Nuclear)	No. 153
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 153.

This amendment application consists of Proposed Change Number (PCN)-483 to Facility Operating License NPF-15. PCN 483 is a request to revise Surveillance Requirement (SR) 3.8.1.8 and applicable Bases to Technical Specification (TS) 3.8.1, "AC Sources - Operating."

The proposed change allows Edison to credit overlap testing for performance of SR 3.8.1.8.

Subscribed on this 15th day of April, 1997.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Dwight E. Nunn
Dwight E. Nunn
Vice President

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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 Mariane Sanchez



DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGE 483

This is a request for a Technical Specification (TS) change to revise Surveillance Requirement (SR) 3.8.1.8 and applicable Bases to Technical Specification (TS) 3.8.1, "AC Sources - Operating." This change will allow Edison to credit overlap testing for performance of SR 3.8.1.8.

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 Surveillance Requirement (SR) 3.8.1.8 and applicable Bases to allow Edison to credit overlap testing for performance of SR 3.8.1.8. This change is needed due to an ongoing effort to re-review the SRs following their revision as part of NRC Amendment Nos. 127 and 116, for SONGS Units 2 and 3, respectively. 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).

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.

The proposed change to revise SR 3.8.1.8 is to allow overlap testing of the transfer capability from the normal offsite circuit to the two alternate offsite circuits. This is accomplished by adding the words "capability of" to the SR and a note that explains the testing required. For each ESF bus, the alternate offsite circuits share a common, train-aligned 4.16 kV cross-tie between units. Complete verification of the capability to transfer to both circuits may be achieved by performing both a manual transfer and an automatic transfer to one of the alternate circuits via the cross-tie, and then performing a circuit functional test of the control circuit devices that allow a transfer to the other alternate circuit. This overlap testing provides complete verification of the transfer capability to both alternate circuits.

The credited alternate offsite source per LCO 3.8.1 at any given time is dependent upon the Engineered Safety Features (ESF) bus alignment in the companion unit. This source may be from either the companion unit's Reserve Auxiliary Transformer or Unit Auxiliary Transformer via the unit 4.16 kV train-aligned cross-tie.

To meet the requirements of SR 3.8.1.8, the capability to transfer to the alternate offsite circuits is verified by transferring to the companion unit's ESF bus via the cross-tie. However, with the companion unit in Modes 1 to 4, its bus is aligned only to the Reserve Auxiliary Transformer. To verify that the other credited alternate offsite source is available, the ESF bus would need to be aligned to the Unit Auxiliary Transformer of the companion unit. This is not possible without the companion unit being in Modes 5 or 6.

The proposed surveillance would perform a complete functional test of the two alternate offsite sources by performing the following:

1. The cross-tie connection to the companion unit's ESF bus (with its ESF bus aligned to the Reserve Auxiliary Transformer) is verified. This functional test verifies that the cross-tie is available, and that a manual and an automatic transfer to one alternate source is possible.
2. To complete the surveillance, a circuit test is performed on that portion of the circuit which permits the companion unit's cross-tie breaker to close with its ESF bus aligned to the Unit Auxiliary Transformer.

By crediting overlapping tests, this method (Items 1 and 2) will fully meet the requirements of the surveillance.

To accomplish the above, the proposed change revises the Surveillance Requirement (SR 3.8.1.8), Bases (Background), Bases (LCO), and Bases (SR 3.8.1.8) as described below. These revisions are found in Attachments C and D.

SR 3.8.1.8

SR 3.8.1.8 is revised by changing "Verify automatic and manual transfer ..." to "Verify capability of automatic and manual transfer..." This will permit the surveillance to include any series of overlapping steps to ensure operability of the alternate offsite power source.

In addition Note 2 would be added to explain the required testing. Specifically, Note 2 would state: "Testing to satisfy this SR shall include actual automatic and manual transfer to at least one alternate offsite circuit. The other alternate offsite circuit may be verified by overlapping circuit tests."

BASES:

Background

The proposed change will add statements to clarify the configuration of the second source of offsite power (alternate preferred power source). Because the required second source of offsite power depends upon the companion unit's bus/transformer alignment, the second source of offsite power may be derived from the other unit's Unit Auxiliary Transformer. This can occur during an outage on the companion unit, when the offsite power may be backfed via the Main Transformer with the Main Generator isolated phase bus links removed. This configuration was previously explained for the same unit (first source of offsite power), but was not included for a unit cross-tie, where the companion unit could be in the outage with the Engineered Safety Features (ESF) bus(es) aligned to its Unit Auxiliary Transformer. For this configuration, the non-operating unit's Unit Auxiliary Transformer serves as the required second offsite power source for ESF bus(es) in the operating unit.

Limiting Condition for Operation (LCO) 3.8.1

The Bases for LCO 3.8.1 currently contains a statement defining "qualified offsite circuits" as being described in the Updated Final Safety Analysis Report (UFSAR). The proposed change will add a statement to define "required" offsite circuits as those that are "credited" and "required" to be operable per the LCO. The term "required" is added to clarify that the offsite circuit of interest is the circuit that is being credited to satisfy the LCO.

The statement "...maintaining rated frequency and voltage..." is changed to "...maintaining frequency and voltage within specified limits..." The term "rated" is not applicable to offsite circuits, which operate within conditions of the power grid.

Statements are added to clarify that the second source of offsite power (offsite circuit #2) can be from the companion unit's Unit Auxiliary Transformer (XU1). This is discussed above.

The words "when the main generator is not operating" are inserted to specify conditions under which the required second source of offsite power is derived from the companion unit's Unit Auxiliary Transformer.

The term "link" is replaced with "links", since there are three (one per phase) in the main generator's isolated bus.

A clarification is added to explain that, during certain conditions, the Unit Auxiliary Transformer (XU1) of the non-operating unit is credited as the second source of offsite power for the operating unit. This is discussed above.

Surveillance Requirement

The terms "verification of the capability to transfer" as opposed to the actual "transfer" itself is introduced since the surveillance can include any series of overlapping steps to ensure operability of the alternate offsite power source. The capability to transfer must be verified for each required alternate offsite circuit, and must be accomplished via the train-aligned unit to unit cross-tie, as explained.

In addition a discussion of the new Note 2 is added to explain that testing shall include actual transfer to at least one alternate offsite circuit and overlapping circuit tests for the other alternate offsite circuit.

For buses A04 and A06, an explanation of the alternate offsite power sources, indicating the appropriate equipment tag numbers, is included. The discussion explains that the required alternate offsite source is any circuit credited as the alternate offsite source per LCO 3.8.1, and further explains that it is dependent upon the offsite circuit alignment in the companion unit.

Also discussed is how, by overlap testing, the capability to transfer to either of the two alternate offsite power sources is verified. As a result, either source may then be credited as being the alternate offsite source per LCO 3.8.1.

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

The proposed change has no impact on any previously evaluated accident. It allows overlapping testing to assure operation of different AC power source alignments which have been previously evaluated.

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 does not affect facility operation. It only changes the method of testing of AC power sources.

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 allows overlapping testing to assure operation of different AC power source alignments. Overlap testing provides an equally valid test of the capability of the alternate offsite power source.

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.

ATTACHMENT "A"
(Existing Specifications)
Unit 2