

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON ) DOCKET NO. 50-362  
COMPANY, ET AL. for a Class 103 license to )  
Acquire, Possess, and Use a Utilization ) Amendment Application No. 10  
Facility as Part of Unit No. 3 of the San )  
Onofre Nuclear Generating Station )

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

This amendment application consists of the following proposed  
changes to Facility Operating License NPF-15:

1. Proposed Change NPF-15-75 is a request to revise Technical Specification 4.8.1.1.2.c to determine the operability of the diesel generator should the diesel fuel oil fail to meet the test for insolubles.
2. Proposed Change NPF-15-83 is a request to revise Section 6, Administrative Controls, to reflect changes in organization structure which will consolidate and increase executive level attention and oversight of all nuclear activities. In addition to revising the structure of the organization and associated review and approval responsibilities, incorporation of new NRC reporting requirements and minor clarification of Section 6 requirements are also included.

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P PDR

Pursuant to 10 CFR 170.22, each of the Proposed Changes contained in Amendment Application No. 10 is considered to constitute a Class I amendment. The basis for this determination is that the Proposed Changes contained in Amendment Application No. 10 are duplicates of those contained in Amendment Application No. 24 to Operating License NPF-10 for San Onofre Nuclear Generating Station, Unit 2. Based on this determination, a Class I fee of \$400 is required for each of the Proposed Changes contained in Amendment Application No. 10. The fee of \$800.00 corresponding to this determination is enclosed.

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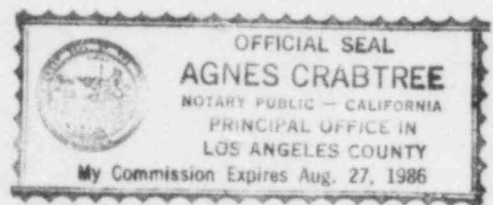
Subscribed on this 7<sup>th</sup> day of March, 1984.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Kenneth P. Bastani

Subscribed and sworn to before me this  
7<sup>th</sup> day of March 1984.



Agnes Crabtree  
Notary Public in and for the County of  
Los Angeles, State of California

Charles R. Kocher  
James A. Beoletto  
Attorneys for Southern  
California Edison Company

By: Charles R. Kocher

Subscribed on this 14 day of FEBRUARY

Respectfully submitted,

SAN DIEGO GAS & ELECTRIC COMPANY

By: J. C. Adams

Subscribed and sworn to before me this

14<sup>th</sup> day of February 1984.

Loraine E. Gray  
Notary Public in and for the County of  
San Diego, State of California



David R. Pigott  
Samuel B. Casey  
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Gas & Electric Company

By: David R. Pigott

THE CITY OF ANAHEIM

By: Dale L. Pahlman

Alan R. Watts  
Rourke & Woodruff  
Attorneys for the City of Anaheim

By: Alan R. Watts

Subscribed and sworn to before me this  
9th day of February, 1984.

E. Lucille Moses  
Notary Public in and for the County of  
Orange, State of California



THE CITY OF RIVERSIDE

By: Fred Kraus

Alan R. Watts  
Rourke & Woodruff  
Attorneys for the City of Riverside

By: Alan R. Watts

Subscribed and sworn to before me this  
9th day of February, 1984.

Margaret J. Allen  
Notary Public in and for the County of  
Riverside, State of California





DESCRIPTION OF PROPOSED CHANGES NPF-10-75 AND NPF-15-75  
AND SAFETY ANALYSIS

This is a request to revise Section 4.8.1.1.2C "Electrical Power Systems Surveillance Requirements" of the Technical Specifications of San Onofre Nuclear Generating Station Units 2 and 3.

Existing Technical Specifications

Unit 2

See Attachment A

Unit 3

See Attachment C

Proposed Technical Specifications

Unit 2

See Attachment B

Unit 3

See Attachment D

Description

Surveillance requirement ASTM-D2274-70 tests diesel fuel oil for insolubles and Reg. Guide 1.137 recommends that diesel generators not be considered inoperable on the basis of this test. However, failure of ASTM-D2274-70 currently requires declaring the diesel generator inoperable. ASTM-D2274-70 tests fuel for storage stability and attempts to determine the level of insolubles at some time in the future by accelerated ageing of the fuel. Therefore, there should be a period of time when the diesel fuel oil will be within the insolubles limits even if the fuel oil fails ASTM-D2274-70. Even if the fuel oil fails this test, there is a considerable period of time before the fuel oil would actually age to the point where the fuel oil will limit a diesel generator's ability to start and continue to run. Action Statement 3.8.1.1 allows a maximum of 72 hours to demonstrate the operability of a diesel generator that has been declared inoperable. If the diesel generator was declared inoperable on the basis of ASTM-D2274-70, the old fuel oil must either be replaced or shown to meet the applicable specification. Replacement of fuel oil or retests take longer than seventy-two hours. Therefore, if a diesel generator is declared inoperable based on ASTM-D2274-70, then the plant must shut down.

Although ASTM-D2274-70 is probably the best method currently available for measuring storage stability of fuel oil, it is imprecise with repeatability and reproducibility within 30% and 100% respectively, as stated in the test procedure. (These figures are for insolubles of 1 mg/100 ml or less. No figures are available for the 2 mg/100 ml level of insolubles.) It is therefore inappropriate that such an imprecise measurement be used to determine the operability of a diesel generator.

The purpose of these changes is to revise surveillance requirements associated with the level of insolubles in the diesel fuel oil to provide actions commensurate with the significance of this test consistent with the recommendations of Reg. Guide 1.137.

### Safety Analysis

The proposed changes discussed above shall be deemed to constitute a significant hazards consideration if there is a positive finding in any of the following areas.

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

Response: No

The diesel generators respond to a loss of offsite power event to provide electric power to emergency busses. These proposed changes revise the surveillance requirements associated with the level of insolubles in the diesel fuel oil to allow adequate time (14 days) to demonstrate operability before entering the associated action statement. Higher levels of insolubles present in the diesel fuel oil does not immediately threaten diesel generator operability. Therefore, the diesel generator will continue to contribute to the mitigation of design bases events and the probability or consequences of an accident previously evaluated remain unchanged.

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

Response: No

The proposed changes do not change the configuration of the plant or the way in which it is operated. Therefore, these changes do not create the possibility for a new or different kind of accident from any previously evaluated.

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

Response: No



The proposed change affects only a surveillance for fuel oil quality which predicts future fuel oil quality. Failure to meet this parameter (insolubles) does not render a Diesel Generator inoperable for the short period allowed by these proposed changes for corrective action to be taken. Since the diesel generators will continue to provide the same degree of protection for the FSAR design bases events, before as well as after the proposed changes, the margin of safety provided by the diesel generators will be unchanged.

48 FR 14864 dated April 6, 1983 provided examples of amendments that are not likely to involve a significant hazards consideration. Although this item does not increase the probability or consequences of any previously analyzed accident, it would most likely be considered to be most similar to example (vi) in that the reduction in technical specification requirements may be perceived to insignificantly reduce in some way a safety margin.

#### Safety and Significant Hazards Determination

Based on the above discussion, Proposed Changes NPF-10-83 and NPF-15-83 do not involve a significant hazards consideration in that it does not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. In addition, it is concluded that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (2) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

CEWilliams:2475A

ATTACHMENT A