

August 30, 1988

Docket Nos.: 50-361 and 50-362

Mr. Kenneth P. Baskin
Vice President
Southern California Edison Company
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770

Mr. Gary D. Cotton
Senior Vice President
Engineering and Operations
San Diego Gas and Electric
101 Ash Street
Post Office Box 1831
San Diego, California 92112

Gentlemen:

SUBJECT: ISSUANCE OF NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENTS
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3
(TAC NOS. 68385, 68386, 68387 AND 68388)

Enclosed for your information is a Notice of Consideration of Issuance of Amendments to Facility Operating Licenses and Opportunity for Hearing. The notice relates to your request of May 6, 1988 to revise the following Technical Specifications: Table 3.3-9, "Remote Shutdown Monitoring Instrumentation"; Table 4.3-6, "Remote Shutdown Monitoring Instrumentation Surveillance Requirements"; 3/4.3.3.7, "Fire Detection Instrumentation"; 3/4.7.8.2, "Spray and/or Sprinkler Systems"; 3/4.7.8.3, "Fire Hose Stations"; 3/4.7.9, "Fire Rated Assemblies"; the Bases for 3/4.3.3.7, "Fire Detection Instrumentation"; and proposed changes to license conditions concerning fire protection. These proposed changes are designated PCN-243 and PCN-244.

The Notice has been sent to Office of the Federal Register for publication.

Sincerely,

original signed by

Donald E. Hickman, Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects

Enclosure:
Notice

cc w/enclosure:
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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

August 30, 1988

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The Notice has been sent to Office of the Federal Register for publication.

Sincerely,

A handwritten signature in dark ink, appearing to read "H. Hickman", with a stylized flourish at the end.

Donald E. Hickman, Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects

Enclosure:
Notice

cc w/enclosure:
See next page

Mr. Kenneth P. Baskin
Southern California Edison Company

San Onofre Nuclear Generating
Station, Units 2 and 3

cc:

Mr. Gary D. Cotton
Senior Vice President
Engineering and Operations
San Diego Gas & Electric Company
101 Ash Street
Post Office Box 1831
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Orange, California 92668-4702

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P. O. Box 60860, Terminal Annex
Los Angeles, California 90060

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Combustion Engineering, Inc.
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Bethesda, Maryland 20814

Mr. Dennis F. Kirsh
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Mr. Dennis M. Smith, Chief
Radiological Programs Division
Governor's Office of Emergency Services
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Sacramento, California 95832

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Encinitas, California 92024

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Southern California Edison Company
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Walnut Creek, California 94596

Resident Inspector, San Onofre NPS
c/o U. S. Nuclear Regulatory Commission
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San Clemente, California 92672

Mr. Sherwin Harris
Resource Project Manager
Public Utilities Department
City of Riverside
City Hall
3900 Main Street
Riverside, California 92522

Southern California Edison Company - 2 - San Onofre 2/3 (when specified)

cc:

California State Library
Government Publications Section
Library & Courts Building
Sacramento, CA 95841
ATTN: Ms. Mary Schnell

Mayor, City of San Clemente
San Clemente, CA 92672

Chairman, Board Supervisors
San Diego County
1600 Pacific Highway, Room 335
San Diego, CA 92101

California Department of Health
ATTN: Chief, Environmental
Radiation Control Unit
Radiological Health Section
714 P Street, Room 498
Sacramento, CA 95814

Mr. Jack McGurk, Acting Chief
Radiological Health Branch
State Department of Health Services
714 P Street, Building #8
Sacramento, California 95814

UNITED STATES NUCLEAR REGULATORY COMMISSION

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL

DOCKET NOS. 50-361 AND 50-362

NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENTS TO

FACILITY OPERATING LICENSES AND OPPORTUNITY FOR HEARING

The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of amendments to Facility Operating License Nos. NPF-10 and NPF-15 issued to Southern California Edison Company (SCE), San Diego Gas and Electric Company, the City of Riverside, California and the City of Anaheim, California (the licensees), for operation of San Onofre Nuclear Generating Station, Units 2 and 3 located in San Diego County, California. The requests for amendments were submitted by letter dated May 6, 1988 and identified as Proposed Change Numbers 243 and 244. Each proposed change is discussed below.

Proposed change No. NPF-10/15-243 would change several Technical Specification (TS) sections as described below:

- (a) T.S. Table 3.3-9, "Remote Shutdown Monitoring Instrumentation" - This table provides a listing of the required instruments for the remote shutdown panel (RSP) along with the instrument channel range. This proposed change would revise the stated RCS cold leg temperature range from 0-600°F to 0-700°F. The RCS hot leg temperature range would similarly be changed from 190-625°F to 0-700°F. This change would also clarify the need to have RCS cold and hot leg temperature indication at RSP L411 only.

This change would also delete the Reactor Coolant Boron Concentration Instrument display and replace it with source range neutron flux indication (10^{-1} - 10^5 CPS).

T.S. Table 4.3-6, "Remote Shutdown Monitoring Instrumentation Surveillance Requirements" - This table provides a listing of RSP instruments and the associated surveillance requirements. The proposed change would replace reactor coolant boron concentration with source range neutron flux to be consistent with the changes to Table 3.3-9.

- (b) T.S. 3/4.3.3.7 "Fire Detection Instrumentation" - This specification and the associated Table 3.3-11 specify the number of fire detection early warning and actuation instruments that must be operable in each fire zone, the action that must be taken when detection equipment is inoperable, and the surveillance requirements for determining operability. This change would allow more early warning detectors to be inoperable before an hourly fire watch is required, would suspend the requirement for an hourly fire watch in areas of temporary radiation and/or life-threatening hazards, and would change the method for determining operability of the fire detection system following a seismic event. Table 3.3-11 would be changed to replace the current designation of each fire zone with the designations used in the Updated Fire Hazards Analysis (UFHA) and to specify only those fire detection based upon the UFHA, 10 CFR 50 Appendix R and Generic Letter 86-10 guidance. The proposed change to Table 3.3-11 would also remove the distinction between heat, smoke, and flame type early warning detectors.

- (c) T.S. 3/4.7.8.2 "Spray and/or Sprinkler Systems" - This specification and the associated Table 3.7-5 designate the actions to be taken when any of the systems listed in Table 3.7-5 are inoperable, and the surveillance requirements for determining operability. The proposed change would suspend the fire watch requirement when equipment is inoperable in areas of temporary radiation and/or life threatening hazards, would specify what constitutes establishment of backup fire suppression equipment, and would change the 18 month surveillance interval to "once per refueling outage for those plant areas that are inaccessible during non-refueling plant operation. Also, Table 3.7-5 would be changed to agree with the UFHA and the computerized plant equipment data base, and to specify only those systems which protect safe shutdown and/or safety related equipment based upon the UFHA, 10 CFR 50 Appendix R, and Generic Letter 86-10 guidance.
- (d) T.S. 3/4.7.8.3 "Fire Hose Stations" - This specification and the associated Table 3.7-6 describe which fire hose stations are required to be operable, the actions to be taken when any are inoperable, and the surveillance requirements for determining operability. This change would remove the requirement to lay backup fire hose to an area served by an inoperable fire hose station if that station is inside containment with the equipment hatch closed, within 250 feet of an operable water source, or if two 150 foot hose packs on the fire engine are operable. The change would also remove the requirement to identify the purpose and location of the backup

hose valves on the signs required to be mounted above the hose and at the inoperable station. The 18-month surveillance requirements would be changed to "once per refueling outage for those plant areas that are inaccessible during non-refueling plant operation." Table 3.7-6 would be change by adding a new column labeled "Fire Area/Zone," by adding 31 hose stations, and by removing Unit 2 hose stations from the Unit 3 Specifications and vice versa.

- (e) T.S. 3/4.7.9 "Fire Rated Assemblies" - This specification delineates which fire rated assemblies and penetrations are required to be operable, when they are required to be operable, the actions to be taken when any are inoperable and the surveillance requirements for determining operability. This change would clarify which assemblies are required to be operable and would only require them to be operable when equipment protected by the assembly is required to be operable, rather than at all times as currently specified. The change would also clarify the action to be taken when any assembly is inoperable, would suspend the requirement for a fire watch in an area of temporary radiation and/or life-threatening hazards, and would change the 18-month surveillance interval to "once per refueling outage for those plant areas that are inaccessible during non-refueling plant operation."
- (f) T.S. Bases 3/4.3.3.7 "Fire Detection Instrumentation" - This section would be changed to reflect proposed changes described in (b) above.

Proposed Change No. NPF-10/15-244 would revise License Conditions 2.C(14) and 2.G for Unit 2 and 2.C(12) and 2.G for Unit 3. The existing license conditions 2.C(14) for Unit 2 and 2.C(12) for Unit 3 reference specific amendments to the fire protection program which were reviewed and approved by the NRC, but have since been superseded by the Updated Fire Hazards Analysis (UFHA) and subsequent SCE submittals to the NRC. The proposed change will require SCE to implement and maintain in effect the fire protection program described in the UFHA and subsequent submittals as approved in the Updated Fire Hazards Analysis Evaluation for San Onofre 2 and 3, Revision 1 dated June 29, 1988. The proposed license condition will allow changes to be made, exclusive of those requirements addressed by Technical Specifications, without prior NRC approval under the authority of 10 CFR 50.59 provided that the changes do not involve an unreviewed safety question and that the changes do not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. Specifically, changes which do not require prior NRC approval are those which do not reduce the current level of San Onofre 2 and 3 compliance with the requirements of 10 CFR 50 Appendix R, Sections III.G, III.J, III.L and III.O (and approved deviations thereto) and which do not involve an unreviewed safety question under 10 CFR 50.59. Compliance with the above sections of Appendix R is identified in the documents referenced in the proposed license condition.

License condition 2.G for both units requires that violation of a license condition be reported within 24 hours to the NRC Regional Administrator with written followup within 14 days. Deviations from the fire protection program required by License Condition 2.C(14) for Unit 2 and 2.C(12) for Unit 3 are currently exempted from 2.G reportability unless they violate the provision of

10 CFR 50, Appendix R, Section III.G, III.J, or III.O and are not otherwise covered by technical specification requirements. The proposed change would revise License Condition 2.G to exempt deviations from the fire protection program which could be interpreted as failure to comply with License Condition 2.C(14) for Unit 2 and 2.C(12) for Unit 3 from reportability under License Condition 2.G. Deviations from the fire protection program which are not otherwise subject to technical specification reporting requirements and which would have adversely affected the ability to achieve and maintain safe shutdown in the event of a fire will be reported under revised Technical Specification 6.9.4, "Special Reports."

This proposed change would also add a new Section 6.9.3 to the Technical Specification for each unit. This change would clarify that violations of the requirements of the fire protection program which are not otherwise subject to technical specification reporting requirements and which would have adversely affected the ability to achieve and maintain safe shutdown in the event of a fire shall be reported to the Regional Administrator of the Regional Office of the NRC via the Licensee Event Report System within 30 days. Before issuance of the proposed license amendments, the Commission will have made findings required by the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations.

By October 11, 1988 the licensee may file a request for a hearing with respect to issuance of the amendments to the subject facility operating licenses, and any person whose interest may be affected by this proceeding and who wishes to participate as a party in the proceeding must file a written request for hearing and petition for leave to intervene. Requests for a

hearing and petitions for leave to intervene shall be filed in accordance with the Commission's "Rules of Practice for Domestic Licensing Proceedings" in 10 CFR Part 2. If a request for a hearing or petition for leave to intervene is filed by the above date, the Commission or an Atomic Safety and Licensing Board Panel designated by the Commission or by the Chairman of the Atomic Safety and Licensing Board Panel will rule on the request and/or petition, and the Secretary or the designated Atomic Safety and Licensing Board will issue a notice of hearing or an appropriate order.

As required by 10 CFR 2.714, a petition for leave to intervene shall set forth with particularity the interest of the petitioner in the proceeding, and how that interest may be affected by the results of the proceeding. The petition should specifically explain the reasons why intervention should be permitted with particular reference to the following factors: (1) the nature of the petitioner's right under the Act to be made a party to the proceeding; (2) the nature and extent of the petitioner's property, financial, or other interest in the proceeding; and (3) the possible effect of any order which may be entered in the proceeding on the petitioner's interest. The petition should also identify the specific aspect(s) of the subject matter of the proceeding as to which petitioner wishes to intervene. Any person who has filed a petition for leave to intervene or who has been admitted as a party may amend the petition without requesting leave of the Board up to fifteen (15) days prior to the first pre-hearing conference scheduled in the proceeding, but such an amended petition must satisfy the specificity requirements described above.

Not later than fifteen (15) days prior to the first pre-hearing conference scheduled in the proceeding, a petitioner shall file a supplement to the petition to intervene which must include a list of the contentions which are sought to be litigated in the matter, and the bases for each contention set forth with reasonable specificity. Contentions shall be limited to matters within the scope of the amendments under consideration. A petitioner who fails to file such a supplement which satisfies these requirements with respect to at least one contention will not be permitted to participate as a party.

Those permitted to intervene become parties to the proceeding, subject to any limitations in the order granting leave to intervene, and have the opportunity to participate fully in the conduct of the hearing, including the opportunity to present evidence and cross-examine witnesses.

A request for a hearing or a petition for leave to intervene shall be filed with the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, DC 20555, Attention: Docketing and Service Branch, or may be delivered to the Commission's Public Document Room, 1717 H Street, NW, Washington, DC, by the above date. Where petitions are filed during the last ten (10) days of the notice period, it is requested that the petitioner or representative for the petitioner promptly inform the Commission by a toll-free telephone call to Western Union at 1-(800)325-6000 (in Missouri 1-(800)342-6700). The Western Union operator should be given Datagram Identification Number 3737 and the following message addressed to George W. Knighton: petitioner's name and telephone number; date petition was mailed; plant name; and publication date and page number of this FEDERAL REGISTER notice. A copy of the petition should also be sent to the Office of the General Counsel, U.S. Nuclear Regulatory

Commission, Washington, DC 20555, and to Mr. Charles R. Kocher, Esq., Southern California Edison Company, 2244 Walnut Grove Avenue, P.O. Box 800, Rosemead, California 91770 and Orrick, Herrington and Sutcliffe, Attention: David R. Pigott, Esq., 600 Montgomery Street, San Francisco, California 94111, attorneys for the licensees.

Nontimely filings of petitions for leave to intervene, amended petitions, supplemental petitions and/or requests for hearing will not be entertained absent a determination by the Commission, the presiding officer or the presiding Atomic Safety and Licensing Board, that the petition and/or request should be granted based upon a balancing of the factors specified in the 10 CFR 2.714(a)(1)(i)-(v) and 2.714(d).

If a request for hearing is received, the Commission's staff may issue the amendment after it completes its technical review and prior to the completion of any required hearing if it publishes a further notice for public comment of its proposed finding of no significant hazards consideration in accordance with 10 CFR 50.91 and 50.92.

For further details with respect to this action, see the application for amendments which is available for public inspection at the Commission's public Document Room, 1717 H Street NW, Washington, DC, and at the General Library, University of California at Irvine, Irvine, California 92713.

Dated at Rockville, Maryland, this 30th day of August, 1988.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink that reads "Harry Rood". The signature is written in a cursive style with a large, stylized "H" and "R".

Harry Rood, Senior Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects