



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

January 20, 1989

Docket Nos.: 50-361 and 50-362

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

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

Gentlemen:

SUBJECT: ISSUANCE OF AMENDMENT NO. 69 TO FACILITY OPERATING LICENSE NPF-10
AND AMENDMENT NO. 38 TO FACILITY OPERATING LICENSE NPF-15 - SAN ONOFRE
NUCLEAR GENERATING STATION, UNITS 2 AND 3 (TAC NOS. 68385, 68386,
68387 AND 68388)

The Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 69 to Facility Operating License No. NPF-10 and Amendment No. 38 to Facility Operating License No. NPF-15 for the San Onofre Nuclear Generating Station, Units 2 and 3, located in San Diego County, California.

The amendments revise (1) License Conditions 2.C(14) and 2.C(12) of Units 2 and 3 respectively to reflect the revised fire protection program, (2) License Conditions 2.G of both units to exempt fire protection program violations from the 24 hour reporting requirement, and (3) the following sections of the Technical Specifications for both units:

- a. Table 3.3.9, "Remote Shutdown Monitoring Instrumentation," to allow for plant instrument improvements;
- b. Section 3.3.3.7, "Fire Detection Instrumentation," to differentiate between early warning fire detectors and actuation fire detectors;
- c. Section 3.7.8.2, "Spray and/or Sprinkler Systems," to more clearly define required compensatory actions for inoperable spray and/or sprinkler systems;
- d. Section 3.7.8.3, "Fire Hose Stations," to more clearly define required compensatory actions for inoperable fire hose stations;
- e. Section 3.7.9, "Fire Rated Assemblies," to comply with current NRC guidelines;
- f. Bases 3/4.3.3.7, "Fire Detection Instrumentation," to be consistent with b. above;

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1/1

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Mr. Kenneth P. Baskin
Mr. Gary D. Cotton

- 2 -

January 20, 1989

- g. Sections 4.7.8.2, 4.7.8.3, and 4.7.9.2 to change the current 18 month surveillance intervals to refueling outage intervals.

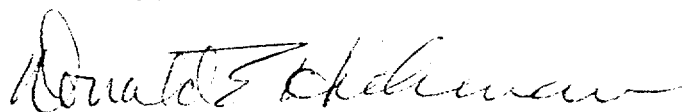
These amendments cover Proposed Change Numbers (PCN) 243 and 244 and were requested by your letter of May 6, 1988, as supplemented by letters dated August 25 and December 7, 1988. The amendments do not include that portion of your proposed Provision 1 of PCN-244 which defines changes that would adversely affect the ability to achieve and maintain safe shutdown. Accordingly, this portion of your request is denied and a copy of the Notice of Denial is enclosed. A copy of the Notice of Issuance of Amendments for the remainder of your request is also enclosed. The notices have been forwarded to the Office of the Federal Register for publication.

Also enclosed for your information is a copy of the related Environmental Assessment that was published in the Federal Register on October 17, 1988.

In your letter of August 25, 1988, you provided the 10 CFR 50.59 evaluation of the power lockout to certain valves required by Branch Technical Position RSB 5-1 to be operable from the control room. Because these valves are in the same general location as those previously approved and there is no time urgency associated with power restoration to them, these changes are acceptable.

Also enclosed is a revised Page 6-1a of the Unit 3 Technical Specifications. This page was revised by Amendment No. 57, dated October 18, 1988. Due to a clerical error, a line was left on that page inadvertently. This revision deletes that line.

Sincerely,



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

Enclosures:

1. Amendment No. 69 to NPF-10
2. Amendment No. 38 to NPF-15
3. Safety Evaluation
4. Notice of Denial
5. Notice of Issuance
6. Environmental Assessment
7. Page 6-1a of Unit 3 TS

cc w/enclosures:
See next page

Mr. Kenneth P. Baskin
Mr. Gary D. Cotton

- 2 -

January 20, 1989

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cc w/enclosures: See next page

DISTRIBUTION

Docket File	OGC (for info only)	ACRS (10)	JLee	Wanda Jones
NRC & Local PDRs	DHagan	GPA/PA	DEHickman	EButcher
PD5 Reading	EJordan	ARM/LFMB	MVirgilio	TMeek (8)

*See previous concurrence

*DRSP/PD5	*DRSP/PD5	*OGC
JLee	DEHickman:dr	
10/12/88	10/ /88	10/ /88

DRSP/PD5
GWK:hton
~~11/ /88~~

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11/

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OFFICIAL RECORD COPY

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Southern California Edison Company

San Onofre Nuclear Generating
Station, Units 2 and 3

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Library & Courts Building
Sacramento, CA 95841
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

DOCKET NO. 50-361

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 69
License No. NPF-10

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the license for San Onofre Nuclear Generating Station, Unit 2 (the facility) filed by the Southern California Edison Company (SCE) on behalf of itself and San Diego Gas and Electric Company, The City of Riverside and The City of Anaheim, California (licensees) dated May 6, 1988, as supplemented August 25 and December 7, 1988, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations as set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public;
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this amendment, and Paragraphs 2.C(2), 2.C(14), and 2.G of Facility Operating License No. NPF-10 are hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 69, are hereby incorporated in the license. SCE shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

- (14) Fire Protection (Section 9.5.1, SER, SSER #4, SSER #5; Section 1.12, SSER #5; SE dated November 15, 1982; Revision 1 to Updated Fire Hazards Analysis Evaluation dated June 29, 1988)

SCE shall implement and maintain in effect all provisions of the approved fire protection program. This program shall be (1) as described in the Updated Fire Hazards Analysis through Revision 3 as revised by letters to the NRC dated May 31, July 22, and November 20, 1987 and January 21, February 22, and April 21, 1988; and (2) as approved in the NRC staff's Safety Evaluation Report (SER) (NUREG-0712) dated February 1981; Supplements 4 and 5 to the SER, dated January 1982 and February 1982, respectively; and the safety evaluation dated November 15, 1982; as supplemented and amended by the Updated Fire Hazards Analysis Evaluation for San Onofre 2 and 3, Revision 1 dated June 29, 1988. SCE may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- 2.G SCE shall report any violations of the requirements contained in Section 2, items C(1), C(3) through C(13), C(15) through C(22), E, and F of this license within 24 hours by telephone and confirm by telegram, mailgram or facsimile transmission to the NRC Regional Administrator, Region V, or his designee, no later than the first working day following the violation, with a written followup report within fourteen (14) days.

3. The changes to the license are to become effective immediately. The changes to the Technical Specifications are to become effective within 30 days of issuance of the amendment. In the period between issuance of the amendment and the effective date of the new Technical Specifications, the licensees shall adhere to the Technical Specifications existing at the time. The period of time during changeover shall be minimized.

4. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



George W. Knighton, Director
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: January 20, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 69

FACILITY OPERATING LICENSE NO. NPF-10

DOCKET NO. 50-361

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. The corresponding overleaf pages are also provided.

<u>Remove</u>	<u>Insert</u>
XX	XX
3/4 3-49	3/4 3-49
3/4 3-50	3/4 3-50
3/4 3-56	3/4 3-56
-	3/4 3-56a
3/4 3-57	3/4 3-57
3/4 3-58	3/4 3-58
3/4 3-59	3/4 3-59
3/4 3-60	3/4 3-60
3/4 3-61	3/4 3-61
3/4 3-62	3/4 3-62
-	3/4 3-62a
3/4 7-29	3/4 7-29
3/4 7-30	3/4 7-30
-	3/4 7-31
-	3/4 7-31a
-	3/4 7-31b
3/4 7-32	3/4 7-32
-	3/4 7-32a
3/4 7-33	3/4 7-33
-	3/4 7-33a
-	3/4 7-33b
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3/4 7-35	3/4 7-35
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REMOTE SHUTDOWN MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>READOUT LOCATION</u>	<u>CHANNEL RANGE</u>	<u>MINIMUM CHANNELS OPERABLE</u>
1. Log Power Level	*	10 ⁻⁸ - 200%	1
2. Reactor Coolant Cold Leg Temperature	#	0-700°F(a)	1
3. Pressurizer Pressure	*	0-3000 psia	1
4. Pressurizer Level	*	0-100%	1
5. Steam Generator Pressure	*	0-1200 psia	1/steam generator
6. Steam Generator Level	*	0-100%	1/steam generator
7. Source Range Neutron Flux	*	10 ⁻¹ -10 ⁵ cps	1
8. Condenser Vacuum	*	0-5" Hg	1
9. Volume Control Tank Level	*	0-100%	1
10. Letdown Heat Exchanger Pressure	*	0-600 psig	1
11. Letdown Heat Exchanger Temperature	*	0-200°F	1
12. Boric Acid Makeup Tank Level	*	0-100%	1
13. Condensate Storage Tank Level	*	0-100%	1
14. Reactor Coolant Hot Leg Temperature	#	0-700°F(b)	1
15. Pressurizer Pressure - Low Range	#	0-1600 psia	1
16. Pressurizer Pressure - High Range	#	1500-2500 psia	1
17. Pressurizer Level	#	0-100%	1
18. Steam Generator Pressure	#	0-1050 psia	1/steam generator
19. Steam Generator Level	#	0-100%	1/steam generator

* Panel L042

#Panel L411

(a) 0-600°F until completion of DCP 6604

(b) 190-625°F until completion of DCP 6604

TABLE 4.3-6

REMOTE SHUTDOWN MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>
1. Log Power Level	M	R
2. Reactor Coolant Cold Leg Temperature	M	R
3. Pressurizer Pressure	M	R
4. Pressurizer Level	M	R
5. Steam Generator Level	M	R
6. Steam Generator Pressure	M	R
7. Source Range Neutron Flux	M	R
8. Condenser Vacuum	M	R
9. Volume Control Tank Level	M	R
10. Letdown Heat Exchanger Pressure	M	R
11. Letdown Heat Exchanger Temperature	M	R
12. Boric Acid Makeup Tank Level	M	R
13. Condensate Storage Tank Level	M	R
14. Reactor Coolant Hot Leg Temperature	M	R
15. Pressurizer Pressure - Low Range	M	R
16. Pressurizer Pressure - High Range	M	R
17. Pressurizer Level	M	R
18. Steam Generator Pressure	M	R
19. Steam Generator Level	M	R

TABLE 4.3-7ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS (CONTINUED)

<u>INSTRUMENT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>
19. Cold Leg HPSI Flow	M	R
20. Hot Leg HPSI Flow	M	R
21. Heated Junction Thermocouple System- Reactor Vessel Level Monitoring System	M	R

INSTRUMENTATION

FIRE DETECTION INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.7 As a minimum, the fire detection instrumentation for each fire detection zone shown in Table 3.3-11 shall be OPERABLE.

APPLICABILITY: Whenever equipment protected by the fire detection instrument is required to be OPERABLE.

ACTION:

With the number of OPERABLE fire detection instrument(s) for each fire area/zone less than the number listed in Table 3.3-11, perform the following as applicable:

- a.1. With less than or equal to 50% of the early warning detectors inoperable, restore the inoperable early warning fire detectors to operable status within 14 days or within the next 1 hour establish an hourly fire watch.*
- a.2. With greater than 50% of the early warning detectors inoperable or with any two or more adjacent early warning fire detectors inoperable, establish an hourly fire watch within 1 hour.*
- a.3. With less than the listed number of actuation detectors operable, establish an hourly fire watch within 1 hour.*
- a.4. For instruments located inside containment, inspect the containment at least once per 8 hours or monitor the containment air temperature at least once per hour at the locations listed in Specification 4.6.1.5.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.7.1 Each of the above required fire detection instruments which are accessible during plant operation shall be demonstrated OPERABLE at least once per 6 months by performance of a CHANNEL FUNCTIONAL TEST. Fire detectors which are not accessible during plant operation shall be demonstrated OPERABLE by the performance of a CHANNEL FUNCTIONAL TEST during each COLD SHUTDOWN exceeding 24 hours unless performed in the previous 6 months.

4.3.3.7.2 The NFPA Standard 72D supervised circuits supervision associated with the detector alarms of each of the above required fire detection instruments shall be demonstrated OPERABLE at least once per 6 months.

*Not required for areas that pose temporary radiation and/or life-threatening safety hazards. If the fire watch/patrol cannot be restored within 24 hours, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 7 days outlining the action taken, the cause of the hazard and the plans and schedule for restoring the required fire watch/patrol.

INSTRUMENTATION

FIRE DETECTION INSTRUMENTATION

SURVEILLANCE REQUIRED (Continued)

4.3.3.7.3 The non-supervised circuits associated with detector alarms between the instruments and the control room shall be demonstrated OPERABLE at least once per 31 days.

4.3.3.7.4 Following a seismic event (basemat acceleration greater than or equal to 0.05 g):

- a. Within 2 hours each fire area/zone shown in Table 3.3-11 shall be inspected for fires, and
- b. Within 72 hours the OPERABILITY of the fire detection system in each fire area/zone shown in Table 3.3-11 shall be assessed by the following:
 1. Status of fire alarms,
 2. Status of trouble alarms,
 3. In-place visual inspection for external damage of detectors for each fire area/zone outside containment.

The results of this assessment shall be evaluated and action taken consistent with Specification 3.3.3.7.

TABLE 3.3-11
FIRE DETECTION INSTRUMENTS

Fire Area/Zone	Instrument Location	Early Warning	Actuation
2-CO-15-1A*	Reactor Coolant Pump 002		8
	Reactor Coolant Pump 004		8
2-CO-15-1B*	Reactor Coolant Pump 001		8
	Reactor Coolant Pump 003		8
2-CO-15-1C*	Containment Area Quadrants 1, 2, 3 and 4 Elevation 30'-0"	4	
	Elevation 45'-0"	9	
	Charcoal Filter Elevation 45'-0"	1**	
2-CO-63-1D*	Operating Floor Elevation 63'-0"	10	
2-PE-9-2A	Penetration Bldg Elevation 9'-0"	4	
2-PE-(-18)-2B	Penetration Bldg Piping Area Elevation (-)18'-0"	2	
2-PE-30-2C	Penetration Bldg Piping Area Elevation 30'-0"	7	
	Charcoal Filter	1**	
2-PE-30-2D	Penetration Bldg Piping Area Elevation 30'-0"	2	
2-PE-45-3A	Penetration Bldg Electrical Penetration Area Elevation 45'-0"	7	
2-PE-63-3B	Penetration Bldg Electrical Penetration Area Elevation 63'-0"	12	

TABLE 3.3-11 (Continued)
FIRE DETECTION INSTRUMENTS

Fire Area/Zone	Instrument Location	Early Warning	Actuation
2-AC-9-5	Auxiliary Control Bldg Cable Spreading Room Elevation 9'-0"	17	36
2-AC-9-13	Auxiliary Control Bldg Lighting Switchgear Room Elevation 9' -0"	2	
2-AC-9-14	Auxiliary Control Bldg Cable Riser Gallery Elevation 9'-0"	7	45
2-AC-30-20C	Auxiliary Control Bldg Computer Room 2 Elevation 30' -0"	6	
2-AC-30-26	Auxiliary Control Bldg Fan Room Elevation 30'-0"	1	
	Air Conditioner Charcoal Filter	1**	
	Emergency Ventilation Charcoal Filter	1**	
2-AC-30-28	Auxiliary Control Bldg Cable Riser Gallery Elevation 30'-0"	3	53
2-AC-50-35	Auxiliary Control Bldg Switchgear Room 2B Elevation 50'-0"	2	
2-AC-50-36	Auxiliary Control Bldg Cable Riser Gallery Elevation 50'-0"	1	13
2-AC-50-37	Auxiliary Control Bldg Cable Riser Gallery Elevation 50'-0"	2	29
2-AC-50-38	Auxiliary Control Bldg HVAC Room 2A Elevation 50'-0"	1	
2-AC-50-39	Auxiliary Control Bldg HVAC Room 2B Elevation 50'-0"	1	
2-AC-50-40	Auxiliary Control Bldg Switchgear Room 2A Elevation 50'-0"	2	
2-AC-50-41	Auxiliary Control Bldg Distribution Room Elevation 50' -0"	1	

TABLE 3.3-11 (Continued)

FIRE DETECTION INSTRUMENTS

Fire Area/Zone	Instrument Location	Early Warning	Actuation
2-AC-50-44	Auxiliary Control Bldg Distribution Room 2B Elevation 50'-0"	1	
2-AC-50-45	Auxiliary Control Bldg Distribution Room 2D Elevation 50'-0"	1	
2-AC-50-46	Auxiliary Control Bldg Distribution Room 2C Elevation 50'-0"	1	
2-AC-50-47	Auxiliary Control Bldg Distribution Room 2A Elevation 50'-0"	1	
2-AC-50-48	Auxiliary Control Bldg Battery Room 2A Elevation 50'-0"	1	
2-AC-50-49	Auxiliary Control Bldg Battery Room 2C Elevation 50'-0"	1	
2-AC-50-50	Auxiliary Control Bldg Battery Room 2D Elevation 50'-0"	1	
2-AC-50-51	Auxiliary Control Bldg Battery Room 2B Elevation 50'-0"	1	
2-AC-70-63	Auxiliary Control Bldg Cable Riser Gallery Elevation 70'-0"	2	24
2-AR-9-87	Auxiliary Radwaste Bldg Charging Pump Room Elevation 9'-0"	1	
2-AR-9-88	Auxiliary Radwaste Bldg Charging Pump Room Elevation 9'-0"	1	
2-AR-9-89	Auxiliary Radwaste Bldg Charging Pump Room Elevation 9'-0"	1	

TABLE 3.3-11 (Continued)

FIRE DETECTION INSTRUMENTS

Fire Area/Zone	Instrument Location	Early Warning	Actuation
2-AR-63-119	Auxiliary Radwaste Bldg Cable Riser Gallery Elevation 63'-6"	2	4
2-FH-17-122	Fuel Handling Bldg Fuel Pool Pump Room Elevation 17'-0"	2	
2-FH-17-123	Fuel Handling Bldg Spent Fuel Pool/Oper Floor Elevation 17'-0"	7	
2-FH-45-130	Fuel Handling Bldg A/C Room No. 2 Elevation 45'-0"	1	
	Charcoal Filter	1**	
2-FH-45-132	Fuel Handling Bldg A/C Room No. 1 Elevation 45'-0"	1	
	Charcoal Filter	1**	
2-SE-(-5)-135B	Safety Equipment Bldg Train B CCW Pump Room Elevation (-)5'-0"	1	
2-SE-(-5)-135C	Safety Equipment Bldg Spare CCW Pump Room Elevation (-)5'-0"	1	
2-SE-(-5)-135D	Safety Equipment Bldg Train A CCW Pump Room Elevation (-)5'-0"	1	
2-SE-(-15)-136	Safety Equipment Bldg A/C Room Elevation 8'-0"	3	
2-SE-(-15)-137A	Safety Equipment Bldg Safety Related Pump Room Elevation (-)15'-0"	1	
2-SE-(-15)-137B	Safety Equipment Bldg Safety Related Pump Room Elevation (-)15'-0"	1	

TABLE 3.3-11 (Continued)

FIRE DETECTION INSTRUMENTS

Fire Area/Zone	Instrument Location	Early Warning	Actuation
2-SE-(-15)-137C	Safety Equipment Bldg Safety Related Pump Room Elevation (-)15'-0"	1	
2-SE-8-140B	Safety Equipment Bldg Chemical Storage Room Elevation 8'-0"	1	
2-SE-30-142A	Safety Equipment Bldg Electrical Tunnel Elevation 30'-0"	17	
	Section 1		17
	Section 2		4
	Section 3		4
	Section 4		4
	Section 5		4
	Section 6		7
2-SE-30-145A	Safety Equipment Bldg Main Steam Relief Valves Elevation 30'-0"	2	
2-TB-7-148A	Turbine Bldg Elevation 7' -0" (2L197Z05)	5	
	Elevation 30' -0" (2L198Z01)	4	
	(2L198Z04)	4	
	Elevation 56' -0" (2L198Z08)	7	
	(2L198Z09)	8	
2-TB-9-148F	Intake Structure Unit 2 Saltwater Cooling Pump Room Elevation 9'-0"	4	
2-CT-(-2)-142B	Electrical Cable Tunnel Elevation (-)2'-0"	21	
	Section 7		39
	Section 8		9
	Section 9		16
	Section 10		10
2-CT-16-142C	Cable Tunnel Cable Shaft Elevation 16'-0"	1	21

TABLE 3.3-11 (Continued)
FIRE DETECTION INSTRUMENTS

Fire Area/Zone	Instrument Location	Early Warning	Actuation
2-DG-30-155	Diesel Generator Bldg Diesel Generator Room B Elevation 30'-0"	3	4
2-DG-30-158	Diesel Generator Bldg Diesel Generator Room A Elevation 30'-0"	3	4
2-TK-30-161A	Tank Building Auxiliary Feedwater Pump Room Elevation 30'-0"	2	6
	AFW Pumps P-504 & P-140		9
<u>COMMON AREAS</u>			
2-AC-9-9	Auxiliary Control Bldg Emergency Chiller Room Elevation 9'-0"	2	
2-AC-9-11	Auxiliary Control Bldg Emergency Chiller Room Elevation 9'-0"	2	
2-AC-9-16	Auxiliary Control Bldg Corridor Elevation 9'-0"	4	
2-AC-9-17	Auxiliary Control Bldg Relay Room Elevation 9' -0"	3	
2-AC-30-20A	Auxiliary Control Bldg Control Room Elevation 30'-0"	27***	
	Control Room Panels	19	
2-AC-30-20E	Auxiliary Control Bldg Lobby Elevation 30' -0"	1	
2-AC-30-23	Auxiliary Control Bldg Fan Room Elevation 30' -0"	1	
	Air Conditioner Charcoal Filter	1**	
	Emergency Ventilation Charcoal Filter	1**	
2-AC-30-26	Auxiliary Control Bldg Fan Room Elevation 30' -0"	1	

TABLE 3.3-11 (Continued)

FIRE DETECTION INSTRUMENTS

Fire Area/Zone	Instrument Location	Early Warning	Actuation
	Air Conditioner Charcoal Filter	1**	
	Emergency Ventilation Charcoal Filter	1**	
2-AC-50-29	Auxiliary Control Bldg Lobby/Monitor Control Room Elevation 50'-0"	12	
2-AC-50-43	Auxiliary Control Bldg Evacuation Room Elevation 50'-0"	1	
2-AC-70-64****	Auxiliary Control Bldg Corridor 401 Elevation 70'-0"	4	
	Radiochem Counting Rm 420 Elevation 70' -0"	1	
	Above Suspended Ceiling Elevation 70' -0"	8	
2-AR-37-102A	Auxiliary Radwaste Bldg Corridor Elevation 37'-0"	9	
2-AR-24-102B	Auxiliary Radwaste Bldg Equipment Room Elevation 24' -0"	4	
2-AR-50-111A	Volume Control Tank Rooms	2	
2-AR-50-111B	Electrical Equipment & Receiving Area	4	
2-AR-63-116	Auxiliary Radwaste Bldg Corridor and Rooms Elevation 63' -6"	4	
2-TB-(-9)-148E	Intake Structure Saltwater Cooling Tunnel Elevation -9' -0"	6	

* The fire detection instruments located within the Containment are not required to be OPERABLE during the performance of Type A Containment Leakage Rate Tests.

** For charcoal filters, the thermistor strip detection system is required to be operable.

*** On completion of DCP 2/3-6554.36TJ.

**** Area/Zone 2-AC-70-64 after Revision 4 of UFHA.

PLANT SYSTEMS

SPRAY AND/OR SPRINKLER SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.8.2 The spray and/or sprinkler systems listed in Table 3.7-5 shall be OPERABLE.

APPLICABILITY: Whenever equipment protected by the spray/sprinkler system is required to be OPERABLE.

ACTION:

- a. With one or more of the above required spray and/or sprinkler systems inoperable, within 1 hour establish a continuous fire watch* with backup fire suppression equipment** for those areas outside containment in which redundant systems or components could be damaged; for other areas outside containment, establish an hourly fire watch patrol.*
- b. With one or more of the above required spray and/or sprinkler systems inside containment inoperable, restore the system to OPERABLE status within 24 hours or, in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 7 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.8.2 Each of the above required spray and/or sprinkler systems shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve (manual, power operated or automatic) outside of containment in the flow path is in its correct position.

*Not required for areas that pose temporary radiation and/or life-threatening safety hazards. If the fire watch/patrol cannot be restored within 24 hours, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 7 days outlining the action taken, the cause of the hazard and the plans and schedule for restoring the required fire watch/patrol.

**Fire hose will be run within 1 hour of entering the ACTION statement if an operable water supply is not available within 250 feet of the area protected by the inoperable spray and/or sprinkler system or 2-150 ft. hose packs (1-3/4") on the fire truck are not operable. Fire hose will be supplied by the fire brigade responding to a fire if an operable water supply is available within 250 feet of the area protected by the inoperable spray and/or sprinkler system.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 31 days during each COLD SHUTDOWN or REFUELING by verifying that each valve (manual, power operated or automatic) inside containment in the flow path is in its correct position,
- c. At least once per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel.
- d. At least once per 18 months*:
 - 1. By performing a system functional test which includes simulated automatic actuation of the system, and:
 - a) Verifying that the automatic valves in the flow path actuate to their correct positions on a test signal, and
 - b) Cycling each valve in the flow path that is not testable during plant operation through at least one complete cycle of full travel.
 - 2. By a visual inspection of the dry pipe spray and wet pipe spray sprinkler headers to verify their integrity, and
 - 3. By a visual inspection of each spray/sprinkler head to verify the spray pattern is not obstructed.
- e. At least once per 3 years by performing an air flow test through each open head spray/sprinkler header and verifying each open head spray/sprinkler nozzle is unobstructed.

*At least once per refueling outage for those plant areas that are inaccessible during non-refueling plant operation.

TABLE 3.7-5

SAFETY-RELATED SPRAY AND/OR SPRINKLER SYSTEMS

Fire Area/Zone	Location of Protection	System Identifier	Type
2-C0-15-1A	Reactor Coolant Pump 002	SA2301MU472	Deluge-Water Spray
	Reactor Coolant Pump 004	SA2301MU470	Deluge-Water Spray
2-C0-15-1B	Reactor Coolant Pump 001	SA2301MU473	Deluge-Water Spray
	Reactor Coolant Pump 003	SA2301MU471	Deluge-Water Spray
2-C0-15-1C	Charcoal Filters In Recirc Filtration Unit Elevation 45'-0"	SA2301MU229	Manually Activated Deluge-Water Spray
2-PE-30-2C	Charcoal Filters Elevation 30'-0"	SA2301MU230	Manually Activated Deluge-Water Spray
2-AC-9-5	Cable Spreading Room Elevation 9'-0"	SA2301MU460 SA2301MU463	Deluge-Water Spray
2-AC-9-14	Cable Riser Gallery Elevation 9'-0"	SA2301MU462	Deluge-Water Spray
2-AC-30-28	Cable Riser Gallery Elevation 30'-0"	SA2301MU451	Deluge-Water Spray
2-AC-50-36	Cable Riser Gallery West Portion Elevation 50'-0"	SA2301MU452	Deluge-Water Spray
2-AC-50-37	Cable Riser Gallery East Portion Elevation 50'-0"	SA2301MU452	Deluge-Water Spray
2-AC-50-38	HVAC Room 2A Elevation 50'-0"	SA2301MU455	Wet Pipe
2-AC-50-39	HVAC Room 2B Elevation 50'-0"	SA2301MU455	Wet Pipe
2-AC-70-63	Cable Riser Gallery	SA2301MU453	Deluge-Water Spray

TABLE 3.7-5 (Continued)

SAFETY-RELATED SPRAY AND/OR SPRINKLER SYSTEMS

Fire Area/Zone	Location of Protection	System Identifier	Type
2-AR-63-119	Cable Riser Gallery Elevation 63'-6"	SA2301MU466	Deluge-Water Spray
2-SE-(-5)-135A	Piping/Heat Exchanger Room Elevation 8'-0"	SA2301MU582	Wet Pipe
2-SE-(-15)-136	A/C Room Elevation 8'-0"	SA2301MU582	Wet Pipe
2-SE-30-142A	Electrical Tunnel Elevation 30'-0"		Deluge-Water Spray
	Section 1	SA2301MU434	
	Section 2	SA2301MU435	
	Section 3	SA2301MU433	
	Section 4	SA2301MU431	
	Section 5	SA2301MU430	
	Section 6	SA2301MU429	
2-FH-45-130	Charcoal Filters Emergency AC Unit 370 Elevation 45'-0"	SA2301MU232	Manually Activated Deluge-Water Spray
2-FH-45-132	Charcoal Filters Emergency AC Unit 371 Elevation 45'-0"	SA2301MU233	Manually Activated Deluge-Water Spray
2-TB-9-148F	Unit 2 Saltwater Cooling Pump Room	SA2301MU583	Wet Pipe
2-CT-(-2)-142B	Electrical Cable Tunnel		Deluge-Water Spray
	Section 7	SA2301MU428	
	Section 8	SA2301MU445	
	Section 9	SA2301MU446	
	Section 10	SA2301MU427	

TABLE 3.7-5 (Continued)

SAFETY-RELATED SPRAY AND/OR SPRINKLER SYSTEMS

Fire Area/Zone	Location of Protection	System Identifier	Type
2-CT-16-142C	Cable Shaft	SA2301MU474	Deluge-Water Spray
2-DG-30-155	Diesel Generator Rm B Elevation 30'-0"	SA2301MU468	Pre-Action Sprinkler
2-DG-30-158	Diesel Generator Rm A Elevation 30'-0"	SA2301MU469	Pre-Action Sprinkler
2-TK-30-161A	Auxiliary Feedwater Pump Room Elevation 30'-0"	S22301MU498 S22301MU499	Pre-Action Sprinkler Deluge-Water Spray
<u>COMMON</u>			
2-AC-9-16	Corridor Elevation 9'-0"	SA2301MU461	Wet Pipe
2-AC-30-23	Emergency AC Unit E-418	SA2301MU346	Manually Activated Deluge-Water Spray
	Charcoal Filter A-207	SA2301MU347	Manually Activated Deluge-Water Spray
2-AC-30-26	Emergency AC Unit E-419	SA2301MU235	Manually Activated Deluge-Water Spray
	Fan Room Elevation 30'-0"	SA2301MU450	Wet Pipe
	Charcoal Filter A-206	SA2301MU234	Manually Activated Deluge-Water Spray
2-AC-30-27	Corridor Elevation 30'-0"	SA2301MU450	Wet Pipe
2-AC-50-29	Lobby/Monitor Control Room	SA2301MU455	Wet Pipe
2-AC-70-64*	Corridor Elevation 70'-0"	SA2301MU454	Wet Pipe
2-TB-(-9)-148E	Saltwater Cooling Tunnel	SA2301MU583 SA2301MU495	Wet Pipe

*Area/Zone 2-AC-70-64 after Revision 4 of UFHA.

PLANT SYSTEMS

FIRE HOSE STATIONS

LIMITING CONDITION FOR OPERATION

3.7.8.3 The fire hose stations shown in Table 3.7-6 shall be OPERABLE.

APPLICABILITY: Whenever equipment in the areas protected by the fire hose stations is required to be OPERABLE.

ACTION:

- a.1. With one or more of the fire hose stations shown in Table 3.7-6 inoperable, route a fire hose* to provide equivalent nozzle flow capacity to the unprotected area(s) from an OPERABLE hose station or alternate fire water supply, within 1 hour if the inoperable fire hose is the primary means of fire suppression; otherwise provide the additional hose within 24 hours. Where it can be demonstrated that the physical routing of the fire hose would result in a recognizable hazard to operating technicians, plant equipment, or the hose itself, a fire hose shall be stored in an area easily accessible to the unprotected area. Signs identifying the purpose and location of the fire hose and related valves shall be mounted above the hose and at the inoperable hose station.
- a.2. With one or more of the above required hose stations inside containment inoperable and the equipment hatch closed, restore the hose station(s) to OPERABLE status within 24 hours or, in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 7 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.8.3 Each of the fire hose stations shown in Table 3.7-6 shall be demonstrated OPERABLE:

- a. At least once per 31 days by visual inspection of the stations accessible during plant operation to assure all required equipment is at the station.

*Fire hose will be run within 1 hour of entering the ACTION statement when an operable water supply is not available within 250 feet of the inoperable hose station(s) or 2-150 ft. hose packs (1-3/4") on the fire truck are not operable. Fire hose will be supplied by the fire brigade responding to a fire if an operable water supply is available within 250 feet of the inoperable hose station(s).

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 18 months* by:
 - 1. Visual inspection of the stations not accessible during plant operations to assure all required equipment is at the station.
 - 2. Removing the hose for inspection and re-racking, and
 - 3. Inspecting all gaskets and replacing any degraded gaskets in the couplings.
- c. At least once per 3 years by:
 - 1. Partially opening each hose station valve to verify valve OPERABILITY and no flow blockage.
 - 2. Conducting a hose hydrostatic test at a pressure of 150 psig or at least 50 psig above the maximum fire main operating pressure, whichever is greater.

*At least once per refueling outage for those plant areas that are inaccessible during non-refueling plant operation.

TABLE 3.7-6
FIRE HOSE STATIONS

LOCATION	FIRE AREA/ZONE	ELEVATION	STATION NO.
Unit 2 Containment	2-CO-63-1D	63'6"	1, 8, 130
Unit 2 Containment	2-CO-15-1C	45'0"	2, 5, 9
Unit 2 Containment	2-CO-15-1C	30'0"	3, 6, 10
Unit 2 Containment	2-CO-15-1C	17'6"	4, 7, 11
Unit 2 Electrical Penetration Area	2-PE-63-3B	63'6"	122, 123
Unit 2 Electrical Penetration Area	2-PE-45-3A	45'0"	120, 121
Cable Spreading Room (North) Auxiliary Control	2-AC-9-5	9'0"	108
Cable Riser Gallery (North) Auxiliary Control	2-AC-9-14	9'0"	109
Cable Riser Gallery (North) Auxiliary Control	2-AC-30-28	30'0"	110
Cable Riser Gallery (North) Auxiliary Control	2-AC-50-37	50'0"	111
Cable Riser Gallery (North) Auxiliary Control	2-AC-70-63	70'0"	112
Piping Room Safety Equipment	2-SE-(-5)-135A	(-)5'6"	31
Piping Room Safety Equipment	2-SE-(-5)-135A	8'0"	30
Corridor Safety Equipment	2-SE-(-15)-136	-15'6"	29
A/C Room Safety Equipment	2-SE-(-15)-136	8'0"	28
Operating Floor Fuel Handling	2-FH-17-123	63'6"	118, 119
Turbine Building	2-TB-7-148A	7'0"	12, 16, 20, 24
Turbine Building	2-TB-7-148A	30'0"	13, 17, 21, 25

TABLE 3.7-6
FIRE HOSE STATIONS (Continued)

LOCATION	FIRE AREA/ZONE	ELEVATION	STATION NO.
Turbine Building	2-TB-7-148A	56'0"	14, 18, 22, 26
Turbine Building	2-TB-7-148A	72'0"	15, 19, 23, 27
Intake Structure	2-TB-9-148C	9'0"	95
Diesel Generator	2-DG-30-158	30'0"	97
Diesel Generator	2-DG-30-155	30'0"	98
<u>COMMON</u>			
Corridor Auxiliary Radwaste	2-AR-9-76	9'0"	32, 36, 40, 44
Corridor Auxiliary Radwaste	2-AR-24-94	24'0"	33, 37, 45
Corridor Auxiliary Radwaste	2-AR-37-102A	37'0"	34, 38, 41, 46
Corridor Auxiliary Radwaste	2-AR-50-111A	50'0"	102, 104, 106
Corridor Auxiliary Radwaste	2-AR-63-116	63'6"	103, 105, 107
Corridor Auxiliary Control	2-AC-9-16	9'0"	48, 52, 60
Corridor Auxiliary Control	2-AC-30-27	30'0"	49
Corridor Auxiliary Control	2-AC-30-22	30'0"	61
Lobby Auxiliary Control	2-AC-30-20E	30'0"	53
Hall-Mezzanine Auxiliary Control	2-AC-39-20D	39'2"	101
Lobby Auxiliary Control	2-AC-50-29	50'0"	50

TABLE 3.7-6
FIRE HOSE STATIONS (Continued)

LOCATION	FIRE AREA/ZONE	ELEVATION	STATION NO.
Lobby - Motor Control Room Auxiliary Control	2-AC-50-29	50'0"	57
Lobby - Motor Control Room Auxiliary Control	2-AC-50-29	50'0"	56
Lobby Auxiliary Control	2-AC-50-29	50'0"	54, 62
Corridor Auxiliary	2-AC-70-64*	70'0"	51, 55, 58, 59
Office Area Auxiliary Control	2-AC-70-64*	70'0"	63
Roof (To Electrical Switchgear Room) Auxiliary Control	2-AC-85-70	85'0"	43
Roof (To Electrical Switchgear Room) Auxiliary Control	2-AC-85-71	85'0"	42

*Area/Zone 2-AC-70-64 after Revision 4 of UFHA.

PLANT SYSTEMS

3/4.7.9 FIRE RATED ASSEMBLIES

LIMITING CONDITION FOR OPERATION

3.7.9 All fire rated assemblies* separating redundant equipment or cable which could affect the ability to achieve and maintain safe shutdown in the event of a fire, or defining areas of the plant which have specific BP 9.5-1, Appendix A, Section F rating requirements, and all penetration sealing devices** in the above barriers shall be OPERABLE.

APPLICABILITY: At all times when the equipment protected by the fire barrier is required to be OPERABLE.

ACTION:

- a. With one or more of the above required fire rated assemblies inoperable, establish a roving fire watch patrol for areas with detection and/or area/zone wide suppression equipment operable on one side within one hour.*** For area(s) with no detection or suppression equipment operable on one side, establish a continuous fire watch.***
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.9.1 Each of the above required fire doors shall be verified OPERABLE by:

- a. Verifying at least once per 24 hours the position of each closed fire door and that doors with automatic hold-open and release mechanisms are free of obstructions.
- b. Verifying at least once per 7 days the position of each locked closed fire door.

*Rated walls, non-rated (heavy concrete) walls, floor/ceilings, raceway enclosures and other fire barriers.

**Fire doors, fire windows, fire dampers, seismic gap seals, cable, ventilation duct and piping penetration seals.

***Not required for areas that pose temporary radiation and/or life-threatening safety hazards. If the fire watch/patrol cannot be restored within 24 hours, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 7 days outlining the action taken, the cause of the hazard and the plans and schedule for restoring the required fire watch/patrol.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

- c. Performing a CHANNEL FUNCTIONAL TEST at least once per 31 days of the fire door supervision system.
- d. Inspecting at least once per 6 months the automatic hold-open, release and closing mechanism and latches.
- e. Performing a functional test at least once per 18 months of automatic hold open, release, closing mechanisms and latches.

4.7.9.2 At least once per 18 months* the above required fire rated assemblies and penetration sealing devices other than fire doors shall be verified OPERABLE by:

- a. Performing a visual inspection of the exposed surfaces of each fire rated assembly.
- b. Performing a visual inspection of each fire window/fire damper/and associated hardware.
- c. Performing a visual inspection of at least 10% of each type (mechanical and electrical) of sealed penetration. If apparent changes in appearance or abnormal degradations are found, a visual inspection of an additional 10% of each type of sealed penetration shall be made. This inspection process shall continue until a 10% sample with no apparent changes in appearance or abnormal degradation is found. Samples shall be selected such that each penetration seal will be inspected at least once per 15 years.

*At least once per refueling outage for those plant areas that are inaccessible during non-refueling plant operation.

INSTRUMENTATION

BASES

room. This capability is required in the event control room habitability is lost and is consistent with General Design Criteria 19 of 10 CFR 50.

The OPERABILITY of the remote shutdown instrumentation in Panel L411 ensures that sufficient capability is available to permit shutdown and maintenance of COLD SHUTDOWN of the facility in the event of a fire in the cable spreading room, control room or remote shutdown panel, L042.

3/4.3.3.6 ACCIDENT MONITORING INSTRUMENTATION

The OPERABILITY of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Plants to Assess Plant Conditions During and Following an Accident," December 1975 and NUREG 0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations".

The containment high range area monitors (RU-148 & RU-149) and the main steamline radiation monitors (RU-139 A&B and RU-140 A&B) are in Table 3.3-6. The high range effluent monitors and samplers (RU-142, RU-144 and RU-146) are in Table 3.3-13. The containment hydrogen monitors are in Specification 3/4.6.5.1. The Post Accident Sampling System (RCS coolant) is in Table 3.3-6.

The Subcooled Margin Monitor (SMM), the Heated Junction Thermocouple (HJTC), and the Core Exit Thermocouples (CET) comprise the Inadequate Core Cooling (ICC) instrumentation required by Item II.F.2 NUREG-0737, the Post TMI-2 Action Plan. The function of the ICC instrumentation is to enhance the ability of the plant operator to diagnose the approach to existence of, and recovery from ICC. Additionally, they aid in tracking reactor coolant inventory. These instruments are included in the Technical Specifications at the request of NRC Generic Letter 83-37. These are not required by the accident analysis, nor to bring the plant to Cold Shutdown.

In the event more than four sensors in a Reactor Vessel Level channel are inoperable, repairs may only be possible during the next refueling outage. This is because the sensors are accessible only after the missile shield and reactor vessel head are removed. It is not feasible to repair a channel except during a refueling outage when the missile shield and reactor vessel head are removed to refuel the core. If only one channel is inoperable, it should be restored to OPERABLE status in a refueling outage as soon as reasonably possible. If both channels are inoperable, both channels shall be restored to OPERABLE status in the nearest refueling outage. In the event that both HJTC channels are inoperable, existing plant instruments and operator training will be used as an alternate method of monitoring the reactor vessel inventory.

INSTRUMENTATION

BASES

3/4.3.3.7 FIRE DETECTION INSTRUMENTATION

OPERABILITY of the fire detection instrumentation ensures that adequate warning capability is available for the prompt detection of fires. This capability is required in order to detect and locate fires in their early stages. Prompt detection of fires will reduce the potential for damage to safe shutdown and/or safety-related equipment and is an integral element in the overall facility fire protection program.

In the event that less than 50% of the fire detection instrumentation is inoperable in any fire area/zone, the establishment of frequent fire patrols in the affected areas is required to provide detection capability until the inoperable instrumentation is restored to OPERABILITY.

Since the fire detectors are non-seismic, a plant visual inspection for fires is required within two hours following an earthquake ($\geq 0.05g$). Since safe shutdown systems are protected by seismic Category I barriers, any fire after an earthquake should be detected by this inspection before safe shutdown systems would be affected. Additionally, to verify the continued OPERABILITY of fire detection systems after an earthquake, an engineering evaluation of the fire detection instrumentation in the required zones is required to be performed within 72 hours following an earthquake.

3/4.3.3.8 RADIOACTIVE LIQUID EFFLUENT INSTRUMENTATION

The radioactive liquid effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in liquid effluents during actual or potential releases of liquid effluents. The alarm/trip setpoints for these instruments shall be calculated in accordance with the procedures in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63 and 64 of Appendix A to 10 CFR Part 50.

3/4.3.3.9 RADIOACTIVE GASEOUS EFFLUENT INSTRUMENTATION

The radioactive gaseous effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in gaseous effluents during actual or potential releases of gaseous effluents. The alarm/trip setpoints for these instruments shall be calculated in accordance with the procedures in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. This instrumentation also includes provisions for monitoring and controlling the concentrations of potentially explosive gas mixtures in the waste gas holdup system. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63 and 64 of Appendix A to 10 CFR Part 50.

3/4.3.3.10 LOOSE-PART DETECTION INSTRUMENTATION

The OPERABILITY of the loose-part detection instrumentation ensures that sufficient capability is available to detect loose metallic parts in the primary system and avoid or mitigate damage to primary system components. The



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

DOCKET NO. 50-362

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 38
License No. NPF-15

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the license for San Onofre Nuclear Generating Station, Unit 3 (the facility) filed by the Southern California Edison Company (SCE) on behalf of itself and San Diego Gas and Electric Company, The City of Riverside and The City of Anaheim, California (licensees) dated May 6, 1988, as supplemented August 25 and December 7, 1988, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations as set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public;
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this amendment, and Paragraphs 2.C(2), 2.C(12), and 2.G of Facility Operating License No. NPF-15 are hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 38, are hereby incorporated in the license. SCE shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

- (12) Fire Protection (Section 9.5.1 SER, SSER #4, SSER #5; Section 1.12, SSER #5; SE dated November 15, 1982; Revision 1 to Updated Fire Hazards Analysis Evaluation dated June 29, 1988)

SCE shall implement and maintain in effect all provisions of the approved fire protection program. This program shall be (1) as described in the Updated Fire Hazards Analysis through Revision 3 as revised by letters to the NRC dated May 31, July 22, and November 20, 1987 and January 21, February 22, and April 21, 1988; and (2) as approved in the NRC staff's Safety Evaluation Report (SER) (NUREG-0712) dated February 1981; Supplements 4 and 5 to the SER, dated January 1982 and February 1982, respectively; and the safety evaluation dated November 15, 1982; as supplemented and amended by the Updated Fire Hazards Analysis Evaluation for San Onofre 2 and 3, Revision 1 dated June 29, 1988. SCE may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- 2.G SCE shall report any violations of the requirements contained in Section 2, items C(1), C(3) through C(11), C(13) through C(22), E, and F of this license within 24 hours by telephone and confirm by telegram, mailgram or facsimile transmission to the NRC Regional Administrator, Region V, or his designee, no later than the first working day following the violation, with a written followup report within fourteen (14) days.

3. The changes to the license are to become effective immediately. The changes to the Technical Specifications are to become effective within 30 days of issuance of the amendment. In the period between issuance of the amendment and the effective date of the new Technical Specifications, the licensees shall adhere to the Technical Specifications existing at the time. The period of time during changeover shall be minimized.

4. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in cursive script, appearing to read "George W. Knighton".

George W. Knighton, Director
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: January 20, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 38

FACILITY OPERATING LICENSE NO. NPF-15

DOCKET NO. 50-362

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. The corresponding overleaf pages are also provided.

<u>Remove</u>	<u>Insert</u>
XIX	XIX
3/4 3-49	3/4 3-49
3/4 3-50	3/4 3-50
3/4 3-57	3/4 3-57
-	3/4 3-57a
3/4 3-58	3/4 3-58
3/4 3-59	3/4 3-59
3/4 3-60	3/4 3-60
3/4 3-61	3/4 3-61
3/4 3-62	3/4 3-62
3/4 3-63	3/4 3-63
-	3/4 3-63a
3/4 7-30	3/4 7-30
3/4 7-31	3/4 7-31
3/4 7-32	3/4 7-32
-	3/4 7-32a
-	3/4 7-32b
3/4 7-33	3/4 7-33
-	3/4 7-33a
3/4 7-34	3/4 7-34
-	3/4 7-34a
-	3/4 7-34b
3/4 7-35	3/4 7-35
3/4 7-36	3/4 7-36
B 3/4 3-4	B 3/4 3-4

Page 3/4 3-64 is reissued without change.

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TABLE 3.3-9

REMOTE SHUTDOWN MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>READOUT LOCATION</u>	<u>CHANNEL RANGE</u>	<u>MINIMUM CHANNELS OPERABLE</u>
1. Log Power Level	*	10 ⁻⁸ - 200%	1
2. Reactor Coolant Cold Leg Temperature	#	0-700°F(a)	1/loop
3. Pressurizer Pressure	*	0-3000 psia	1
4. Pressurizer Level	*	0-100%	1
5. Steam Generator Pressure	*	0-1200 psia	1/steam generator
6. Steam Generator Level	*	0-100%	1/steam generator
7. Source Range Neutron Flux	*	10 ⁻¹ -10 ⁵ cps	1
8. Condenser Vacuum	*	0-5" Hg	1
9. Volume Control Tank Level	*	0-100%	1
10. Letdown Heat Exchanger Pressure	*	0-600 psig	1
11. Letdown Heat Exchanger Temperature	*	0-200°F	1
12. Boric Acid Makeup Tank Level	*	0-100%	1
13. Condensate Storage Tank Level	*	0-100%	1
14. Reactor Coolant Hot Leg Temperature	#	0-700°F(b)	1
15. Pressurizer Pressure - Low Range	#	0-1600 psia	1
16. Pressurizer Pressure - High Range	#	1500-2500 psia	1
17. Pressurizer Level	#	0-100%	1
18. Steam Generator Pressure	#	0-1050 psia	1/steam generator
19. Steam Generator Level	#	0-100%	1/steam generator

* Panel L042
#Panel L411

(a) 0-600°F until completion of DCP 6604
(b) 190-625°F until completion of DCP 6604

TABLE 4.3-6

REMOTE SHUTDOWN MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>
1. Log Power Level	M	R
2. Reactor Coolant Cold Leg Temperature	M	R
3. Pressurizer Pressure	M	R
4. Pressurizer Level	M	R
5. Steam Generator Level	M	R
6. Steam Generator Pressure	M	R
7. Source Range Neutron Flux	M	R
8. Condenser Vacuum	M	R
9. Volume Control Tank Level	M	R
10. Letdown Heat Exchanger Pressure	M	R
11. Letdown Heat Exchanger Temperature	M	R
12. Boric Acid Makeup Tank Level	M	R
13. Condensate Storage Tank Level	M	R
14. Reactor Coolant Hot Leg Temperature	M	R
15. Pressurizer Pressure - Low Range	M	R
16. Pressurizer Pressure - High Range	M	R
17. Pressurizer Level	M	R
18. Steam Generator Pressure	M	R
19. Steam Generator Level	M	R

INSTRUMENTATION

FIRE DETECTION INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.7 As a minimum, the fire detection instrumentation for each fire detection zone shown in Table 3.3-11 shall be OPERABLE.

APPLICABILITY: Whenever equipment protected by the fire detection instrument is required to be OPERABLE.

ACTION:

With the number of OPERABLE fire detection instrument(s) for each fire area/zone less than the number listed in Table 3.3-11, perform the following as applicable:

- a.1 With less than or equal to 50% of the early warning detectors inoperable, restore the inoperable early warning fire detectors to operable status within 14 days or within the next 1 hour establish an hourly fire watch.*
- a.2 With greater than 50% of the early warning detectors inoperable or with any two or more adjacent early warning fire detectors inoperable, establish an hourly fire watch within 1 hour.*
- a.3 With less than the listed number of actuation detectors operable, establish an hourly fire watch within 1 hour.*
- a.4 For instruments located inside containment, inspect the containment at least once per 8 hours or monitor the containment air temperature at least once per hour at the locations listed in Specification 4.6.1.5.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.7.1 Each of the above required fire detection instruments which are accessible during plant operation shall be demonstrated OPERABLE at least once per 6 months by performance of a CHANNEL FUNCTIONAL TEST. Fire detectors which are not accessible during plant operation shall be demonstrated OPERABLE by the performance of a CHANNEL FUNCTIONAL TEST during each COLD SHUTDOWN exceeding 24 hours unless performed in the previous 6 months.

4.3.3.7.2 The NFPA Standard 72D supervised circuits supervision associated with the detector alarms of each of the above required fire detection instruments shall be demonstrated OPERABLE at least once per 6 months.

*Not required for areas that pose temporary radiation and/or life-threatening safety hazards. If the fire watch/patrol cannot be restored within 24 hours, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 7 days outlining the action taken, the cause of the hazard and the plans and schedule for restoring the required fire watch/patrol.

INSTRUMENTATION

FIRE DETECTION INSTRUMENTATION

SURVEILLANCE REQUIREMENTS (Continued)

4.3.3.7.3 The non-supervised circuits associated with detector alarms between the instruments and the control room shall be demonstrated OPERABLE at least once per 31 days.

4.3.3.7.4 Following a seismic event (basemat acceleration greater than or equal to 0.05 g):

- a. Within 2 hours each fire area/zone shown in Table 3.3-11 shall be inspected for fires, and
- b. Within 72 hours the OPERABILITY of the fire detection system in each fire area/zone shown in Table 3.3-11 shall be assessed by the following:
 1. Status of fire alarms,
 2. Status of trouble alarms,
 3. In-place visual inspection for external damage of detectors for each fire area/zone outside containment.

The results of this assessment shall be evaluated and action taken consistent with Specification 3.3.3.7.

TABLE 3.3-11
FIRE DETECTION INSTRUMENTS

Fire Area/Zone	Instrument Location	Early Warning	Actuation
3-CO-15-1A*	Reactor Coolant Pump 002		9
	Reactor Coolant Pump 004		8
3-CO-15-1B*	Reactor Coolant Pump 001		8
	Reactor Coolant Pump 003		8
3-CO-15-1C*	Containment Area Quadrants 1, 2, 3 and 4 Elevation 30' -0"	4	
	Elevation 45' -0"	9	
	Charcoal Filter Elevation 45' -0"	1**	
3-CO-63-1D*	Containment Area Operating Floor Elevation 63' -0"	10	
3-PE-9-2A	Penetration Bldg Elevation 9' 0"	4	
3-PE-(-18)-2B	Penetration Bldg Piping Area Elevation (-) 18' -0"	2	
3-PE-30-2C	Penetration Bldg Piping Area Elevation 30' -0"	7	
	Charcoal Filter	1**	
3-PE-30-2D	Penetration Bldg Piping Area Elevation 30' -0"	2	
3-PE-45-3A	Penetration Bldg Electrical Penetration Area Elevation 45' -0"	7	
3-PE-63-3B	Penetration Bldg Electrical Penetration Area Elevation 63' -0"	12	

TABLE 3.3-11 (Continued)
FIRE DETECTION INSTRUMENTS

Fire Area/Zone	Instrument Location	Early Warning	Actuation
3-AC-9-6	Auxiliary Control Bldg Cable Spreading Room Elevation 9' -0"	14	36
3-AC-9-7	Auxiliary Control Bldg Cable Riser Gallery Elevation 9' -0"	7	39
3-AC-30-20B	Auxiliary Control Bldg Computer Room Elevation 30' -0"	6	
3-AC-30-23	Auxiliary Control Bldg Fan Room Elevation 30' -0"	1	
	Air Conditioner Charcoal Filter	1**	
	Emergency Ventilation Charcoal Filter	1**	
3-AC-30-21	Auxiliary Control Bldg Cable Riser Gallery Elevation 30' -0"	3	52
3-AC-50-30	Auxiliary Control Bldg HVAC Room 3B Elevation 50' -0"	1	
3-AC-50-31	Auxiliary Control Bldg HVAC Room 3A Elevation 50' -0"	1	
3-AC-50-32	Auxiliary Control Bldg Cable Riser Gallery Elevation 50' -0"	2	27
3-AC-50-33	Auxiliary Control Bldg Cable Riser Gallery Elevation 50' -0"	1	13
3-AC-50-34	Auxiliary Control Bldg Switchgear Room 3B Elevation 50' -0"	2	
3-AC-50-52	Auxiliary Control Bldg Battery Room 3B Elevation 50' -0"	1	
3-AC-50-53	Auxiliary Control Bldg Battery Room 3D Elevation 50' -0"	1	

TABLE 3.3-11 (Continued)

FIRE DETECTION INSTRUMENTS

Fire Area/Zone	Instrument Location	Early Warning	Actuation
3-AC-50-54	Auxiliary Control Bldg Battery Room 3C Elevation 50' -0"	1	
3-AC-50-55	Auxiliary Control Bldg Battery Room 3A Elevation 50' -0"	1	
3-AC-50-56	Auxiliary Control Bldg Distribution Room 3A Elevation 50' -0"	1	
3-AC-50-57	Auxiliary Control Bldg Distribution Room 3C Elevation 50' -0"	1	
3-AC-50-58	Auxiliary Control Bldg Distribution Room 3D Elevation 50' -0"	1	
3-AC-50-59	Auxiliary Control Bldg Distribution Room 3B Elevation 50' -0"	1	
3-AC-50-60	Auxiliary Control Bldg Switchgear Room 3A Elevation 50' -0"	2	
3-AC-50-62	Auxiliary Control Bldg Distribution Room Elevation 50' -0"		
3-AC-50-62	Auxiliary Control Bldg Distribution Room Elevation 50' -0"	1	
3-AC-70-65	Auxiliary Control Bldg Cable Riser Gallery Elevation 70' -0"	3	24
3-AR-9-91	Auxiliary Radwaste Bldg Charging Pump Room Elevation 9' -0"	1	
3-AR-9-92	Auxiliary Radwaste Bldg Charging Pump Room Elevation 9' -0"	1	
3-AR-9-93	Auxiliary Radwaste Bldg Charging Pump Room Elevation 9' -0"	1	

TABLE 3.3-11 (Continued)
FIRE DETECTION INSTRUMENTS

Fire Area/Zone	Instrument Location	Early Warning	Actuation
3-AR-63-118	Auxiliary Radwaste Bldg Cable Tray Gallery Elevation 63' -0"	2	4
3-FH-17-122	Fuel Handling Bldg Fuel Pool Pump Room Elevation 17' -0"	2	
3-FH-17-123	Fuel Handling Bldg Spent Fuel Pool/Oper Floor Elevation 17' -0"	7	
3-FH-45-130	Fuel Handling Bldg A/C Room No. 2 Elevation 45' -0"	1	
	Charcoal Filter	1**	
3-FH-45-132	Fuel Handling Bldg A/C Room No. 1 Elevation 45' -0"	1	
	Charcoal Filter	1**	
3-SE-(-5)-135B	Safety Equipment Bldg Train B CCW Pump Room Elevation -5' -0"	1	
3-SE-(5)-135C	Safety Equipment Bldg Spare CCW Pump Room Elevation -5' -0"	1	
3-SE-(-5)-135D	Safety Equipment Bldg Train A CCW Pump Room Elevation (-)5' -0"	1	
3-SE-(-15)-136	Safety Equipment Bldg A/C Room Elevation 8' -0"	3	
3-SE-(-15)-137A	Safety Equipment Bldg Safety Related Pump Room Elevation (-)15' -0"	1	
3-SE-(-15)-137B	Safety Equipment Bldg Safety Related Pump Room Elevation (-)15' -0"	1	
3-SE-(-15)-137C	Safety Equipment Bldg Safety Related Pump Room Elevation (-)15' -0"	1	

TABLE 3.3-11 (Continued)

FIRE DETECTION INSTRUMENTS

Fire Area/Zone	Instrument Location	Early Warning	Actuation
3-SE-8-140B	Safety Equipment Bldg Chemical Storage Room Elevation 8' -0"	1	
3-SE-30-142A	Safety Equipment Bldg Electrical Tunnel Elevation 30' -0"	17	
	Section 1		15
	Section 2		4
	Section 3		4
	Section 4		4
	Section 5		4
	Section 6		7
3-SE-30-145A	Safety Equipment Bldg Main Steam Relief Valves Elevation 30' -0"	2	
3-TB-7-148A	Turbine Bldg Elevation 7' -0" (3L197Z05)	5	
	Elevation 30' -0" (3L198Z01)	4	
	(3L198Z04)	4	
	Elevation 56' -0" (3L198Z08)	7	
	(3L198Z09)	8	
3-TB-9-148F	Intake Structure Unit 3 Saltwater Cooling Pump Room Elevation 9' -0"	4	
3-CT-(-2)-142B	Electrical Cable Tunnel Elevation (-)2' -0"	21	
	Section 7		39
	Section 8		9
	Section 9		16
	Section 10		10
3-CT-16-142C	Cable Tunnel Cable Shaft Elevation 16' -0"	1	21
3-DG-30-155	Diesel Generator Bldg Diesel Generator Room B Elevation 30' -0"	3	4

TABLE 3.3-11 (Continued)

FIRE DETECTION INSTRUMENTS

Fire Area/Zone	Instrument Location	Early Warning	Actuation
3-DG-30-158	Diesel Generator Bldg Diesel Generator Room A Elevation 30' -0"	3	4
3-TK-30-161A	Tank Building Auxiliary Feedwater Pump Room Elevation 30' -0"	2	6
	AFW Pumps P-504 & P-140		9
<u>COMMON AREAS</u>			
2-AC-9-9	Auxiliary Control Bldg Emergency Chiller Room Elevation 9' -0"	2	
2-AC-9-11	Auxiliary Control Bldg Emergency Chiller Room Elevation 9' -0"	2	
2-AC-9-16	Auxiliary Control Bldg Corridor Elevation 9' -0"	4	
2-AC-9-17	Auxiliary Control Bldg Relay Room Elevation 9' -0"	3	
2-AC-30-20A	Auxiliary Control Bldg Control Room Elevation 30' -0"	27***	
	Control Room Panels	19	
2-AC-30-20E	Auxiliary Control Bldg Lobby Elevation 30' -0"	1	
2-AC-30-23	Auxiliary Control Bldg Fan Room Elevation 30' -0"	1	
	Air Conditioner Charcoal Filter	1**	
	Emergency Ventilation Charcoal Filter	1**	
2-AC-30-26	Auxiliary Control Bldg Fan Room Elevation 30' -0"	1	
	Air Conditioner Charcoal Filter	1**	
	Emergency Ventilation Charcoal Filter	1**	

TABLE 3.3-11 (Continued)

FIRE DETECTION INSTRUMENTS

Fire Area/Zone	Instrument Location	Early Warning	Actuation
2-AC-50-29	Auxiliary Control Bldg Lobby/Monitor Control Room Elevation 50' -0"	12	
2-AC-50-43	Auxiliary Control Bldg Evacuation Room Elevation 50'-0"	1	
2-AC-70-64****	Auxiliary Control Bldg Corridor 401 Elevation 70' -0"	4	
	Radiochem Counting Rm 420 Elevation 70' -0"	1	
	Above Suspended Ceiling Elevation 70' -0"	8	
2-AR-37-102A	Auxiliary Radwaste Bldg Corridor Elevation 37' -0"	9	
2-AR-24-102B	Auxiliary Radwaste Bldg Equipment Room Elevation 24' -0"	4	
2-AR-50-111A	Volume Control Tank Rooms	2	
2-AR-50-111B	Electrical Equipment and Receiving Area	4	
2-AR-63-116	Auxiliary Radwaste Bldg Corridor and Rooms Elevation 63' -6"	4	
2-TB-(-9)-148E	Intake Structure Saltwater Cooling Tunnel Elevation -9' -0"	6	

* The fire detection instruments located within the Containment are not required to be OPERABLE during the performance of Type A Containment Leakage Rate Tests.

** For charcoal filters, the thermistor strip detection system is required to be operable.

*** On completion of DCP 2/3-6554.36TJ.

**** Area/Zone 2-AC-70-64 after Revision 4 of UFHA.

INSTRUMENTATION

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.8 The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3-12 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.11.1.1 are not exceeded. The alarm/trip setpoints of these channels shall be determined in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM).

APPLICABILITY: At all times.

ACTION:

- a. With a radioactive liquid effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, immediately suspend the release of radioactive liquid effluents monitored by the affected channel or declare the channel inoperable.
- b. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-12. Exert best efforts to return the instrument to OPERABLE status within 30 days and, additionally, if the inoperable instrument(s) remain inoperable for greater than 30 days, explain in the next Semiannual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.
- c. The provisions of Specifications 3.0.3, 3.0.4, and 6.9.1.13b are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.8.1 Each radioactive liquid effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-8.

4.3.3.8.2 At least once per 4 hours, all pumps required to be providing dilution to meet the site radioactive effluent concentration limits of Specification 3.11.1.1 shall be determined to be operating and providing dilution to the discharge structure.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4.7.8.1.3 The fire pump diesel starting 24-volt battery bank and charger shall be demonstrated OPERABLE:

- a. At least once per 7 days by verifying that:
 - 1. The electrolyte level of each battery is above the plates, and
 - 2. The overall battery voltage is greater than or equal to 24 volts.
- b. At least once per 92 days by verifying that the specific gravity is appropriate for continued service of the battery.
- c. At least once per 18 months by verifying that:
 - 1. The batteries, cell plates and battery racks show no visual indication of physical damage or abnormal deterioration, and
 - 2. The battery-to-battery and terminal connections are clean, tight, free of corrosion, and coated with anti-corrosion material.

PLANT SYSTEMS

SPRAY AND/OR SPRINKLER SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.8.2 The spray and/or sprinkler systems listed in Table 3.7-5 shall be OPERABLE.

APPLICABILITY: Whenever equipment protected by the spray/sprinkler system is required to be OPERABLE.

ACTION:

- a. With one or more of the above required spray and/or sprinkler systems inoperable, within 1 hour establish a continuous fire watch* with back-up fire suppression equipment** for those areas outside containment in which redundant systems or components could be damaged; for other areas outside containment, establish an hourly fire watch patrol.*
- b. With one or more of the above required spray and/or sprinkler systems inside containment inoperable, restore the system to OPERABLE status within 24 hours or, in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 7 days outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status
- c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.8.2 Each of the above required spray and/or sprinkler systems shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve (manual, power-operated or automatic) outside of containment in the flow path is in its correct position.

*Not required for areas that pose temporary radiation and/or life-threatening safety hazards. If the fire watch/patrol cannot be restored within 24 hours, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 7 days outlining the action taken, the cause of the hazard and the plans and schedule for restoring the required fire watch/patrol.

**Fire hose will be run within 1 hour of entering the ACTION statement if an operable water supply is not available within 250 feet of the area protected by the inoperable spray and/or sprinkler system or 2-150 ft. hose packs (1-3/4") on the fire truck are not operable. Fire hose will be supplied by the fire brigade responding to a fire if an operable water supply is available within 250 feet of the area protected by the inoperable spray and/or sprinkler system.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 31 days during each COLD SHUTDOWN or REFUELING by verifying that each valve (manual, power-operated or automatic) inside containment in the flow path is in its correct position.
- c. At least once per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel.
- d. At least once per 18 months*:
 - 1. By performing a system functional test which includes simulated automatic actuation of the system, and:
 - a) Verifying that the automatic valves in the flow path actuate to their correct positions on a test signal, and
 - b) Cycling each valve in the flow path that is not testable during plant operation through at least one complete cycle of full travel.
 - 2. By a visual inspection of the dry pipe spray and wet pipe spray sprinkler headers to verify their integrity, and
 - 3. By a visual inspection of each spray/sprinkler head to verify the spray pattern is not obstructed.
- e. At least once per 3 years by performing an air flow test through each open head spray/sprinkler header and verifying each open head spray/sprinkler nozzle is unobstructed.

*At least once per refueling outage for those plant areas that are inaccessible during non-refueling plant operation.

TABLE 3.7-5

SAFETY-RELATED SPRAY AND/OR SPRINKLER SYSTEMS

Fire Area/Zone	Location of Protection	System Identifier	Type
3-CO-15-1A	Reactor Coolant Pump 002	SA2301MU506	Deluge-Water Spray
	Reactor Coolant Pump 004	SA2301MU507	Deluge-Water Spray
3-CO-15-1B	Reactor Coolant Pump 001	SA2301MU504	Deluge-Water Spray
	Reactor Coolant Pump 003	SA2301MU505	Deluge-Water Spray
3-CO-15-1C	Charcoal Filters In Recirc Filtration Unit Elevation 45' -0"	SA2301MU348	Manually Activated Deluge-Water Spray
3-PE-30-2C	Charcoal Filters Elevation 30' -0"	SA2301MU349	Manually Activated Deluge-Water Spray
3-AC-9-6	Cable Spreading Room Elevation 9' -0"	SA2301MU464 SA2301MU465	Deluge-Water Spray
3-AC-9-7	Cable Riser Gallery Elevation 9' -0"	SA2301MU459	Deluge-Water Spray
3-AC-30-21	Cable Riser Gallery Elevation 30' -0"	SA2301MU458	Deluge-Water Spray
3-AC-50-30	HVAC Room 3B Elevation 50' -0"	SA2301MU455	Wet Pipe
3-AC-50-31	HVAC Room 3A Elevation 50' -0"	SA2301MU455	Wet Pipe
3-AC-50-32	Cable Riser Gallery East Portion Elevation 50' -0"	SA2301MU457	Deluge-Water Spray
3-AC-50-33	Cable Riser Gallery West Portion Elevation 50' -0"	SA2301MU457	Deluge-Water Spray
3-AC-70-65	Cable Riser Gallery Elevation 70' -0"	SA2301MU456	Deluge-Water Spray
3-AR-63-118	Cable Riser Gallery Elevation 63' -0"	SA2301MU467	Deluge-Water Spray

TABLE 3.7-5 (Continued)

SAFETY-RELATED SPRAY AND/OR SPRINKLER SYSTEMS

Fire Area/Zone	Location of Protection	System Identifier	Type
3-SE-(-5)-135A	Piping/Heat Exchanger Room Elevation 8' -0"	SA2301MU480	Wet Pipe
3-SE-(-15)-136	A/C Room Elevation 8' -0"	SA2301MU480	Wet Pipe
3-SE-30-142A	Electrical Tunnel Elevation 30' -0"		Deluge-Water Spray
	Section 1	SA2301MU477	
	Section 2	SA2301MU478	
	Section 3	SA2301MU479	
	Section 4	SA2301MU481	
	Section 5	SA2301MU482	
	Section 6	SA2301MU483	
3-FH-45-130	Charcoal Filters Emergency AC Unit E-370 Elevation 45' -0"	SA2301MU351	Manually Activated Deluge-Water Spray
3-FH-45-132	Charcoal Filter Emergency AC Unit E-371 Elevation 45' -0"	SA2301MU352	Manually Activated Deluge-Water Spray
3-TB-9-148F	Unit 3 Saltwater Cooling Pump Room	SA2301MU495	Wet Pipe
3-CT-(-2)-142B	Electrical Cable Tunnel		Deluge-Water Spray
	Section 7	SA2301MU484	
	Section 8	SA2301MU500	
	Section 9	SA2301MU501	
	Section 10	SA2301MU485	

TABLE 3.7-5 (Continued)

SAFETY-RELATED SPRAY AND/OR SPRINKLER SYSTEMS

Fire Area/Zone	Location of Protection	System Identifier	Type
3-CT-16-142C	Cable Shaft	SA2301MU503	Deluge-Water Spray
3-DG-30-155	Diesel Generator Rm B Elevation 30' -0"	SA2301MU496	Pre-Action Sprinkler
3-DG-30-158	Diesel Generator Rm A Elevation 30' -0"	SA2301MU497	Pre-Action Sprinkler
3-TK-30-161A	Auxiliary Feedwater Pump Room Elevation 30' -0"	S32301MU498	Pre-Action Sprinkler
		S32301MU499	Deluge-Water Spray
<u>COMMON</u>			
2-AC-9-16	Corridor Elevation 9' -0"	SA2301MU461	Wet Pipe
2-AC-30-23	Emergency AC Unit E-418	SA2301MU346	Manually Activated Deluge-Water Spray
	Charcoal Filter A-207	SA2301MU347	Manually Activated Deluge-Water Spray
2-AC-30-26	Emergency AC Unit E-419	SA2301MU235	Manually Activated Deluge-Water Spray Wet Pipe
	Fan Room Elevation 30' -0"	SA2301MU450	
	Charcoal Filter A-206	SA2301MU234	Manually Activated Deluge-Water Spray
2-AC-30-27	Corridor Elevation 30' -0"	SA2301MU450	Wet Pipe
2-AC-50-29	Lobby/Monitor Control Room	SA2301MU455	Wet Pipe
2-AC-70-64*	Corridor Elevation 70' -0"	SA2301MU454	Wet Pipe
2-TB-(-9)-148E	Saltwater Cooling Tunnel	SA2301MU583	Wet Pipe
		SA2301MU495	
3-TB-9-148F	Unit 3 Saltwater Cooling Pump Room	SA2301MU495	Wet Pipe

*Area/Zone 2-AC-70-64 after Revision 4 of UFHA.

PLANT SYSTEMS

FIRE HOSE STATIONS

LIMITING CONDITION FOR OPERATION

3.7.8.3 The fire hose stations shown in Table 3.7-6 shall be OPERABLE.

APPLICABILITY: Whenever equipment in the areas protected by the fire hose stations is required to be OPERABLE.

ACTION:

- a.1. With one or more of the fire hose stations shown in Table 3.7-6 inoperable, route a fire hose* to provide equivalent nozzle flow capacity to the unprotected area(s) from an OPERABLE hose station or alternate fire water supply, within 1 hour if the inoperable fire hose is the primary means of fire suppression; otherwise provide the additional hose within 24 hours. Where it can be demonstrated that the physical routing of the fire hose would result in a recognizable hazard to operating technicians, plant equipment, or the hose itself, a fire hose shall be stored in an area easily accessible to the unprotected area. Signs identifying the purpose and location of the fire hose and related valves shall be mounted above the hose and at the inoperable hose station.
- a.2. With one or more of the above required hose stations inside containment inoperable and the equipment hatch closed, restored the hose station(s) to OPERABLE status within 24 hours or, in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 7 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.8.3 Each of the fire hose stations shown in Table 3.7-6 shall be demonstrated OPERABLE:

- a. At least once per 31 days by visual inspection of the stations accessible during plant operation to assure all required equipment is at the station.

*Fire hose will be run within 1 hour of entering the ACTION statement when an operable water supply is not available within 250 feet of the inoperable hose station(s) or 2-150 ft. hose packs (1-3/4") on the fire truck are not operable. Fire hose will be supplied by the fire brigade responding to a fire if an operable water supply is available within 250 feet of the inoperable hose station(s).

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 18 months* by:
 - 1. Visual inspection of the stations not accessible during plant operations to assure all required equipment is at the station.
 - 2. Removing the hose for inspection and re-racking, and
 - 3. Inspecting all gaskets and replacing any degraded gaskets in the couplings.
- c. At least once per 3 years by:
 - 1. Partially opening each hose station valve to verify valve OPERABILITY and no flow blockage.
 - 2. Conducting a hose hydrostatic test at a pressure of 150 psig or at least 50 psig above the maximum fire main operating pressure, whichever is greater.

*At least once per refueling outage for those plant areas that are inaccessible during non-refueling plant operation.

TABLE 3.7-6
FIRE HOSE STATIONS

LOCATION	FIRE AREA/ZONE	ELEVATION	STATION NO.
Unit 3 Containment	3-CO-63-110	63'6"	67, 74, 131
Unit 3 Containment	3-CO-15-1C	45'0"	68, 70, 73
Unit 3 Containment	3-CO-15-1C	30'0"	64, 66, 72
Unit 3 Containment	3-CO-15-1C	17'6"	65, 69, 71
Unit 3 Electrical Penetration Area	3-PE-63-3B	63'6"	126, 127
Unit 3 Electrical Penetration Area	3-PE-45-3A	45'0"	124, 125
Unit 3 Cable Spreading Room (South) Auxiliary Control	3-AC-9-6	9'0"	113
Unit 3 Cable Riser Gallery (South) Auxiliary Control	3-AC-9-7	9'0"	114
Unit 3 Cable Riser Gallery (South) Auxiliary Control	3-AC-30-21	30'0"	115
Unit 3 Cable Riser Gallery (South) Auxiliary Control	3-AC-50-32	50'0"	116
Unit 3 Cable Riser Gallery (North) Auxiliary Control	3-AC-70-65	70'0"	117
Unit 3 Roof (To Elect. Switchgear Room) Auxiliary Control	3-AC-85-71	85'0"	42
Unit 3 Piping Room Safety Equipment	3-SE-(-5)-135A	(-)5'6"	92
Unit 3 Piping Room Safety Equipment	3-SE-(-5)-135A	8'0"	91
Unit 3 Corridor Safety Equipment	3-SE-(-15)-136	-15'0"	93

TABLE 3.7-6
FIRE HOSE STATIONS (Continued)

LOCATION	FIRE AREA/ZONE	ELEVATION	STATION NO.
Unit 3 A/C Room Safety Equipment	3-SE-(-15)-136	8'0"	94
Unit 3 Operating Floor Fuel Handling	3-FH-17-123	63'6"	128, 129
Unit 3 Turbine Building	3-TB-7-148A	7'0"	83, 78, 87, 79
Unit 3 Turbine Building	3-TB-7-148A	30'0"	75, 84, 80, 88
Unit 3 Turbine Building	3-TB-7-148A	56'0"	76, 85, 89, 81
Unit 3 Turbine Building	3-TB-7-148A	72'0"	77, 82, 90, 86
Unit 3 Intake Structure	3-TB-9-148C	9'0"	96
Unit 3 Diesel Generator	3-DG-30-158	30'0"	99
Unit 3 Diesel Generator	3-DG-30-155	30'0"	100
<u>COMMON</u>			
Corridor Auxiliary Radwaste	2-AR-9-76	9'0"	32, 36, 40, 44
Corridor Auxiliary Radwaste	2-AR-24-94	24'0"	33, 37, 45
Corridor Auxiliary Radwaste	2-AR-37-102A	37'0"	34, 38, 41, 46
Corridor Auxiliary Radwaste	2-AR-50-111A	50'0"	102, 104, 106
Corridor Auxiliary Radwaste	2-AR-63-116	63'6"	103, 105, 107
Corridor Auxiliary Control	2-AC-9-16	9'0"	48, 52, 60
Corridor Auxiliary Control	2-AC-30-27	30'0"	49
Corridor Auxiliary Control	2-AC-30-22	30'0"	61

TABLE 3.7-6

FIRE HOSE STATIONS (Continued)

LOCATION	FIRE AREA/ZONE	ELEVATION	STATION NO.
Lobby Auxiliary Control	2-AC-30-20E	30'0"	53
Hall-Mezzanine Auxiliary Control	2-AC-39-20D	39'2"	101
Lobby Auxiliary Control	2-AC-50-29	50'0"	50
Lobby - Motor Control Room Auxiliary Control	2-AC-50-29	50'0"	57
Lobby - Motor Control Room Auxiliary Control	2-AC-50-29	50'0"	56
Lobby Auxiliary Control	2-AC-50-29	50'0"	54, 62
Corridor Auxiliary	2-AC-70-64*	70'0"	51, 55, 58, 59
Office Area Auxiliary Control	2-AC-70-64*	70'0"	63
Roof (To Electrical Switchgear Room) Auxiliary Control	2-AC-85-70	85'0"	43
Roof (To Electrical Switchgear Room) Auxiliary Control	2-AC-85-71	85'0"	42

*Area/Zone 2-AC-70-64 after Revision 4 of UFHA.

PLANT SYSTEMS

3/4.7.9 FIRE RATED ASSEMBLIES

LIMITING CONDITION FOR OPERATION

3.7.9 All fire rated assemblies* separating redundant equipment or cable which could affect the ability to achieve and maintain safe shutdown in the event of a fire, or defining areas of the plant which have specific BTP 9.5-1, Appendix A, Section F requirements, and all penetration sealing devices** in the above barriers shall be OPERABLE.

APPLICABILITY: At all times when the equipment protected by the fire barrier is required to be OPERABLE.

ACTION:

- a. With one or more of the above required fire rated assemblies inoperable, establish a roving fire watch patrol for areas with detection and/or area/zone wide suppression equipment operable on one side within one hour.*** For area(s) with no detection for suppression equipment operable on one side, establish a continuous fire watch.***
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.9.1 Each of the above required fire doors shall be verified OPERABLE by:

- a. Verifying at least once per 24 hours the position of each closed fire door and that doors with automatic hold-open and release mechanisms are free of obstructions.
- b. Verifying at least once per 7 days the position of each locked closed fire door.

*Rated walls, non-rated (heavy concrete) walls, floor/ceilings, raceway enclosures and other fire barriers.

**Fire doors, fire windows, fire dampers, seismic gap seals, cable, ventilation duct and piping penetration seals.

***Not required for areas that pose temporary radiation and/or life-threatening safety hazards. If the fire watch/patrol cannot be restored within 24 hours, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 7 days outlining the action taken, the cause of the hazard and the plans and schedule for restoring the required fire watch/patrol.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

- c. Performing a CHANNEL FUNCTIONAL TEST at least once per 31 days of the fire door supervision system.
- d. Inspecting at least once per 6 months the automatic hold-open, release, and closing mechanism and latches.
- e. Performing a functional test at least once per 18 months of the automatic hold-open, release, closing mechanisms and latches.

4.7.9.2 At least once per 18 months* the above required fire rated assemblies and penetration sealing devices other than fire doors shall be verified OPERABLE by:

- a. Performing a visual inspection of the exposed surfaces of each fire rated assembly.
- b. Performing a visual inspection of each fire window/fire damper/ and associated hardware.
- c. Performing a visual inspection of at least 10% of each type (mechanical and electrical) of sealed penetration. If apparent changes in appearance or abnormal degradations are found, a visual inspection of an additional 10% of each type of sealed penetration shall be made. This inspection process shall continue until a 10% sample with no apparent changes in appearance or abnormal degradation is found. Samples shall be selected such that each penetration seal will be inspected at least once per 15 years.

*At least once per refueling outage for those plant areas that are inaccessible during non-refueling plant operation.

INSTRUMENTATION

BASES

room. This capability is required in the event control room habitability is lost and is consistent with General Design Criteria 19 of 10 CFR 50.

The OPERABILITY of the remote shutdown instrumentation in Panel L411 ensures that sufficient capability is available to permit shutdown and maintenance of COLD SHUTDOWN of the facility in the event of a fire in the cable spreading room, control room or remote shutdown panel, L042.

3/4.3.3.6 ACCIDENT MONITORING INSTRUMENTATION

The OPERABILITY of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Plants to Assess Plant Conditions During and Following an Accident," December 1975 and NUREG 0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations".

The containment high range area monitors (RU-148 & RU-149) and the main steamline radiation monitors (RU-139 A&B and RU-140 A&B) are in Table 3.3-6. The high range effluent monitors and samplers (RU-142, RU-144 and RU-146) are in Table 3.3-13. The containment hydrogen monitors are in Specification 3/4.6.5.1. The Post Accident Sampling System (RCS coolant) is in Table 3.3-6.)

The Subcooled Margin Monitor (SMM), the Heated Junction Thermocouple (HJTC), and the Core Exit Thermocouples (CET) comprise the Inadequate Core Cooling (ICC) instrumentation required by Item II.F.2 NUREG-0737, the Post TMI-2 Action Plan. The function of the ICC instrumentation is to enhance the ability of the plant operator to diagnose the approach to existence of, and recovery from ICC. Additionally, they aid in tracking reactor coolant inventory. These instruments are included in the Technical Specifications at the request of NRC Generic Letter 83-37. These are not required by the accident analysis, nor to bring the plant to Cold Shutdown.

In the event more than four sensors in a Reactor Vessel Level channel are inoperable, repairs may only be possible during the next refueling outage. This is because the sensors are accessible only after the missile shield and reactor vessel head are removed. It is not feasible to repair a channel except during a refueling outage when the missile shield and reactor vessel head are removed to refuel the core. If only one channel is inoperable, it should be restored to OPERABLE status in a refueling outage as soon as reasonably possible. If both channels are inoperable, both channels shall be restored to OPERABLE status in the nearest refueling outage. In the event that both HJTC channels are inoperable, existing plant instruments and operator training will be used as an alternate method of monitoring the reactor vessel inventory.

INSTRUMENTATION

BASES

3/4.3.3.7 FIRE DETECTION INSTRUMENTATION

OPERABILITY of the fire detection instrumentation ensures that adequate warning capability is available for the prompt detection of fires. This capability is required in order to detect and locate fires in their early stages. Prompt detection of fires will reduce the potential for damage to safe shutdown and/or safety-related equipment and is an integral element in the overall facility fire protection program.

In the event that less than 50% of the fire detection instrumentation is inoperable in any fire area/zone, the establishment of frequent fire patrols in the affected areas is required to provide detection capability until the inoperable instrumentation is restored to OPERABILITY.

Since the fire detectors are non-seismic, a plant visual inspection for fires is required within two hours following an earthquake ($>0.05g$). Since safe shutdown systems are protected by seismic Category I barriers, any fire after an earthquake should be detected by this inspection before safe shutdown systems would be affected. Additionally, to verify the continued OPERABILITY of fire detection systems after an earthquake, an engineering evaluation of the fire detection instrumentation in the required zones is required to be performed within 72 hours following an earthquake.

3/4.3.3.8 RADIOACTIVE LIQUID EFFLUENT INSTRUMENTATION

The radioactive liquid effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in liquid effluents during actual or potential releases of liquid effluents. The alarm/trip setpoints for these instruments shall be calculated in accordance with the procedures in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63 and 64 of Appendix A to 10 CFR Part 50.

3/4.3.3.9 RADIOACTIVE GASEOUS EFFLUENT INSTRUMENTATION

The radioactive gaseous effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in gaseous effluents during actual or potential releases of gaseous effluents. The alarm/trip setpoints for these instruments shall be calculated in accordance with the procedures in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. This instrumentation also includes provisions for monitoring and controlling the concentrations of potentially explosive gas mixtures in the waste gas holdup system. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63 and 64 of Appendix A to 10 CFR Part 50.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 69 TO FACILITY OPERATING LICENSE NO. NPF-10
AND AMENDMENT NO. 38 TO FACILITY OPERATING LICENSE NO. NPF-15
SOUTHERN CALIFORNIA EDISON COMPANY, ET AL.
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3
DOCKET NOS. 50-361 AND 50-362

1.0 INTRODUCTION

By letter dated May 6, 1988, as supplemented by letters dated August 25 and December 7, 1988, Southern California Edison Company (SCE), on behalf of itself and the other licensees, San Diego Gas and Electric Company, The City of Riverside, California, and The City of Anaheim, California, submitted an application for license amendments for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. The NRC staff's evaluation of this application (referred to as Proposed Change Numbers 243 and 244) is described below.

2.0 DISCUSSION

PCN-243

Proposed change NPF-10/15-243 would change the following sections of the SONGS Units 2 and 3 Technical Specifications:

1. Table 3.3-9, "Remote Shutdown Monitoring Instrumentation," and Table 4.3-6, "Remote Shutdown Monitoring Instrumentation Surveillance Requirements," would be modified to allow for plant instrument improvements;
2. Technical Specification 3.3.3.7, "Fire Detection Instrumentation," would be modified to differentiate between early warning fire detectors and actuation fire detectors and change the Technical Specification nomenclature to that which is utilized in the Updated Fire Hazard Analysis (UFHA).
3. Technical Specification 3.7.8.2, "Spray and/or Sprinkler Systems," would be modified to more clearly define required compensatory actions for inoperable spray and/or sprinkler systems. This change would also change nomenclature to that utilized in the UFHA.

4. Technical Specification 3.7.8.3, "Fire Hose Stations," would be modified to more clearly define required compensatory actions for inoperable fire hose stations. This change would also change nomenclature to that utilized in the UFHA.
5. Technical Specification 3.7.9, "Fire Rated Assemblies," would be modified to comply with current NRC guidelines for fire rated assemblies.
6. Technical Specification Bases B 3/5 3.3.7, "Fire Detection Instrumentation," would be modified consistent with the changes described above.
7. Technical Specifications 4.7.8.2, 4.7.8.3, and 4.7.9.2 would be modified to change the current 18 month surveillance intervals to refueling outage intervals.

The staff has evaluated the proposed change described in Item 1 above. The licensee has proposed to revise the ranges of the RCS hot and cold leg temperature instruments to be consistent with the ranges of the same instruments in the control room. Because this change would provide consistency and help to avoid confusion, the staff finds it acceptable. This change would also clarify the need to have RCS cold and hot leg temperature indication at RSP L411. This change is acceptable since it is a clarification only. The proposed change would also replace the Reactor Coolant Boron Concentration instrument on Panel L042 with a Source Range Neutron Flux instrument. This change is acceptable because source range flux is a more direct indication of core power than boron concentration, the flux response is faster than the response of core power to boron concentration, and the Source Range Neutron Flux instrument will be a Class 1E instrument unlike the current boron concentration instrument. Therefore, the proposed changes to Tables 3.3-9 and 4.3-6 are acceptable.

The proposed changes described in Items 2 through 7 above relate to the SONGS Fire Protection Program.

The licensee has been conducting a reassessment of the SONGS 2/3 Fire Protection Program against the staff's fire protection guidelines. This has resulted in, among other changes, the re-delineation of fire areas and the implementation of fire protection modifications such as the installation of additional fire detectors. Also, the reassessment identified certain fire protection features which no longer need to be encompassed by the Technical Specifications because they are not required to satisfy staff fire protection guidelines. These features have been installed, in general, to minimize the risk from fire and reduce property loss consistent with insurance carrier recommendations.

As a result of the above reassessment the former plant Technical Specifications are no longer valid in all instances. A number of the licensee's proposed changes will update the Technical Specifications to be consistent with the staff-approved fire protection program and the language of the Standard Technical Specifications and are, therefore, considered acceptable.

A number of the licensee's proposed changes to the Technical Specifications can be considered as "reformatting" which are intended to more accurately describe the systems to be monitored or more clearly state the actions which must be taken when a fire protection system is considered out of service. The staff has reviewed these changes and agrees with the licensee that they will facilitate long-term compliance.

The licensee has also proposed to suspend the requirement to implement fire watches in affected areas which pose temporary radiation or life threatening hazards. If a fire watch cannot be restored within 24 hours, however, the licensee proposes to submit a Special Report within the next 7 days which details the licensee's proposed course of action. The staff agrees that there may occur a limited number of instances when personal safety will override the need to conduct fire watches for a brief period of time. The staff considers the licensee's approach to this issue to be reasonable and to not adversely impact plant fire protection.

In addition, the licensee has proposed to rely upon back-up fire hose in hose packs which are on the site fire engine, under certain circumstances, when standpipe outlets or fire suppression systems are not in service. This will be done in lieu of installing fire hose in the affected areas. Because the plant has a full-time, on-site, fully trained professional fire brigade, the staff considers the licensee's proposal to provide an equivalent level of protection to that achieved by implementing the action statement of the Standard Technical Specifications.

With regard to the proposed change to Technical Specification (T.S.) 3.7.9, covering fire barriers, the staff was initially concerned that the licensee would not be conducting surveillance for all fire barriers which are required to satisfy staff fire protection guidelines or to compensate for deviations from these guidelines. However, the barriers which are encompassed by T.S. 3.7.9 include barriers and associated sealing devices that separate redundant safe shutdown equipment or cable, or that define areas of the plant as delineated in Section F of Appendix A to BTP APCSB 9.5-1. On this basis, the staff considers this issue resolved.

The licensee has implemented 24 month refueling cycles and has proposed changing the interval for performing certain surveillances from 18 months to refueling outage.

The plant Technical Specifications were originally written to enable certain surveillances to be accomplished during refueling outages to minimize operator exposure to high levels of radiation. With the extension of the licensee's refueling interval to 24 months, surveillances of components within containment and in high radiation areas need to be extended. The new surveillance frequencies of the above-referenced fire protection features conform with the guidance contained in National Fire Protection Association Standards. The staff concludes, therefore, that the increase in surveillance intervals will not significantly reduce the reliability of these fire protection systems.

Based on the above evaluation, the staff concludes that the proposed Technical Specification changes relating to fire protection features are acceptable.

PCN-244

Proposed Change NPF-10/15-244 would modify License Condition 2.C(14) for Unit 2 and License Condition 2.C(12) for Unit 3 to reflect the revised fire protection program described in the Updated Fire Hazards Analysis and subsequent licensee submittals, as approved by the staff. It would allow SCE to make changes to the approved fire protection program without prior Commission approval if those changes would not adversely affect the ability to achieve and maintain safe shutdown. Furthermore, it would define changes which do not require prior approval as those which would not reduce the level of compliance with the requirements of 10 CFR 50, Appendix R, Sections III.G, III.J, III.L and III.O, and which do not involve an unreviewed safety question. This change would also require the licensee to provide information to the staff concerning three of the open items identified in the staff's Safety Evaluation of the Updated Fire Hazards Analyses for San Onofre Nuclear Generating Station Units 2 and 3, Revision 1, dated June 29, 1988. Finally, the proposed change would remove the requirement in License Condition 2.G for a 24-hour report of any violation of the fire protection license condition and add a new Section 6.9.3 to the Special Reports section of the Technical Specifications which would require a Licensee Event Report to be submitted within 30 days of any violation of the requirements of the fire protection program.

The staff has evaluated the licensee's Updated Fire Hazards Analysis and subsequent submittals of May 31, July 22, and November 20, 1987 and January 21, February 22, and April 21, 1988. This evaluation is documented in Revision 1 of the Safety Evaluation of the Updated Fire Hazards Analysis for San Onofre Nuclear Generating Station, Units 2 and 3, dated June 29, 1988. In that Safety Evaluation the staff found the licensee's fire protection program to be acceptable with five open items. The licensee's Updated Fire Hazards Analysis and subsequent submittals therefore describe a fire protection program acceptable to the staff pending resolution of these open items.

Generic Letter 86-10 allows licensees to make changes to their approved fire protection program without prior Commission approval if those changes would not adversely affect the ability to achieve and maintain safe shutdown. Therefore, that portion of the proposed fire protection license condition change is acceptable. However, Generic Letter 86-10 also adequately defines changes which would adversely affect the ability to achieve and maintain safe shutdown; therefore, it is not appropriate to include in the license condition the definition proposed by the licensee.

By letter dated August 25, 1988 the licensee provided the information required to be submitted by the proposed fire protection license condition change; hence, those portions of the proposed change are not necessary.

Generic Letter 88-12 describes fire protection reporting requirements as those deficiencies which meet the criteria of 10 CFR 50.72 or 10 CFR 50.73. Therefore, the proposed change to License Condition 2.6 to remove the reporting requirement for any violation of the fire protection license condition is acceptable, and the proposed new Technical Specification 6.9.3 is not necessary.

3.0 SUMMARY OF STAFF EVALUATION

The staff has found the proposed amendment to be acceptable with the following exceptions:

- a. Proposed Provision 1 to the fire protection license conditions should read as follows:

"SCE may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire." The remainder of proposed Provision 1 is not acceptable because Generic Letter 86-10 is the source of guidance concerning changes which do not require prior Commission approval. The license condition is not the appropriate place to provide that guidance.

- b. Provisions 2, 3, and 4 to the fire protection license conditions should be deleted because the licensee has satisfied those conditions by letter dated August 25, 1988.
- c. Proposed new Technical Specification 6.9.3 should be deleted because the fire protection reporting requirements are in 10 CFR 50.72 and 10 CFR 50.73.

4.0 CONTACT WITH STATE OFFICIAL

The NRC staff has advised the Chief of the Radiological Health Branch, State Department of Health Services, State of California, of the proposed determination of no significant hazards consideration. No comments were received.

5.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32 and 51.35, an environmental assessment and finding of no significant impact have been published (53 FR 40537) in the Federal Register on October 17, 1988. Accordingly, based upon the environmental assessment, the Commission has determined that the issuance of these amendments will not have a significant effect on the quality of the human environment.

6.0 CONCLUSION

Based upon our evaluation of the proposed changes, we have concluded that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: D. Kubicki
D. Hickman

Dated: January 20, 1989

UNITED STATES NUCLEAR REGULATORY COMMISSIONSOUTHERN CALIFORNIA EDISON COMPANY, ET ALDOCKET NOS. 50-361 and 50-362SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3NOTICE OF DENIAL OF AMENDMENTS TO FACILITY OPERATING LICENSESAND OPPORTUNITY FOR HEARING

The U.S. Nuclear Regulatory Commission (the Commission) has denied in part a request by the licensees for amendments to Facility Operating Licenses Nos. NPF-10 and NPF-15, issued to Southern California Edison Company, San Diego Gas and Electric Company, the City of Anaheim, California and the City of Riverside, California (the licensees), for the operation of San Onofre Nuclear Generating Station, Units 2 and 3 (the facilities), located in San Diego County, California.

The application for amendments was dated May 6, 1988, as supplemented by letters dated August 25 and December 7, 1988. The Notice of Consideration of Issuance of Amendments was published in the FEDERAL REGISTER on September 9, 1988 (53 FR 35138).

The amendments, as proposed by the licensees, would revise (1) License Conditions 2.C(14) and 2.C(12) (Fire Protection) of Units 2 and 3 respectively to reflect the revised fire protection program; (2) License Conditions 2.G (Reporting Requirements) of both units to exempt fire protection program violations from the 24-hour reporting requirement; (3) Table 3.3.9, "Remote Shutdown Monitoring Instrumentation," to allow for plant instrument improvements; and (4) several technical specifications related to the revised fire protection program.

Generic Letter 86-10 allows licensees to make changes to their approved fire protection program without prior Commission approval if those changes would not adversely affect the ability to achieve and maintain safe shutdown. Therefore, that portion of the proposed fire protection license condition change is acceptable. However, Generic Letter 86-10 also adequately defines changes which would adversely affect the ability to achieve and maintain safe shutdown; therefore, it is not appropriate to include in the license condition the definition proposed by the licensees. Therefore, that portion of the proposed fire protection license condition has been denied. In addition to the above partial denial, three other provisions in the proposed fire protection license condition were not included because they were satisfied by the licensee's submittal of August 25, 1988. Also, the proposed addition of Technical Specification 6.9.3 was not included because it is not required.

The licensees were notified of the Commission's denial of this request by letter dated January 20, 1989. The other changes requested by the application have been approved by the issuance of Amendments No. 69 and 38.

By March 2, 1989, the licensees may demand a hearing with respect to the denial described above and any persons whose interest may be affected by this proceeding may file a written petition for leave to intervene.

A request for a hearing or petition for leave to intervene must 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, 2120 L Street, NW, Washington, DC, by the above date.

A copy of the petition should also be sent to the General Counsel, U.S. Nuclear Regulatory Commission, Washington, D.C., 20555, and to Charles R. Kocher, Assistant General Counsel and James Beoletto, Esq., Southern California Edison Company, P.O. Box 800, Rosemead, California 91770, attorneys for the licensees.

For further details with respect to this action, see (1) the application for amendment dated May 6, 1988, as supplemented by letters dated August 25 and December 7, 1988, and (2) the Commission's letter and Safety Evaluation issued with Amendment No. 69 and Amendment No. 38 to NPF 10 and NPF-15, respectively. These documents are available for public inspection at the Commission's Public Document Room 2120 L Street, NW, Washington, DC, and at the General Library, University of California, P.O. Box 19557, Irvine, California 92713. Single copies of Item (2) may be obtained upon request address to the U.S. Nuclear Regulatory Commission, Washington, DC 20555, Attention: Division of Reactor Projects - III, IV, V and Special Projects.

Dated at Rockville, Maryland, this 20th day of January, 1989.

FOR THE NUCLEAR REGULATORY COMMISSION

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

UNITED STATES NUCLEAR REGULATORY COMMISSIONSOUTHERN CALIFORNIA EDISON COMPANY, ET AL.DOCKET NOS. 50-361 AND 50-362NOTICE OF ISSUANCE OF AMENDMENTS TOFACILITY OPERATING LICENSES

The U.S. Nuclear Regulatory Commission (Commission) has issued Amendment No. 69 to Facility Operating License No. NPF-10 and Amendment No. 38 to Facility Operating License No. NPF-15, issued to Southern California Edison Company, San Diego Gas and Electric Company, The City of Riverside, California and The City of Anaheim, California (the licensees), which revised the Technical Specifications for operation of the San Onofre Nuclear Generating Station, Units 2 and 3, located in San Diego County, California.

The amendments were effective as of the date of issuance.

These amendments revised (1) License Conditions 2.C(14) and 2.C(12) of Units 2 and 3 respectively and the related Technical Specifications to reflect the revised fire protection program; (2) License Conditions 2.G of both units to exempt fire protection program violations from the 24 hour reporting requirement; and (3) Technical Specification Table 3.3.9, "Remote Shutdown Monitoring Instrumentation," to allow for plant instrument improvements in response to an application for amendments designated as PCN-243 and PCN-244.

Several portions of the licensee's request were either denied or not acted on. The following is a discussion of these items. Generic Letter 86-10 allows licensees to make changes to their approved fire protection program without prior Commission approval if those changes would not adversely affect the ability to achieve and maintain safe shutdown. Generic Letter 86-10 also

defines changes which would adversely affect the ability to achieve and maintain safe shutdown. The licensee has proposed a definition different from that contained in the Generic Letter; the proposed definition has been found unacceptable. Therefore, that portion of the proposed fire protection license condition has been denied. In addition to the above partial denial, three other provisions in the proposed fire protection license condition were not included because they were satisfied by the licensees' submittal of August 25, 1988. Also, the proposed addition of Technical Specification 6.9.3 was not included because it is not required.

The application for amendments complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendments.

Notice of Consideration of Issuance of Amendments and Opportunity for Hearing in connection with this action was published in the FEDERAL REGISTER on September 9, 1988 (53 FR 35138). No request for a hearing or petition for leave to intervene was filed following this notice.

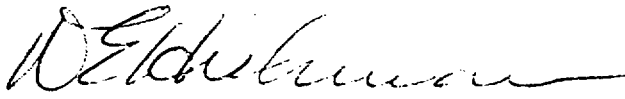
The Commission has prepared an Environmental Assessment related to the action and has determined that an environmental impact statement will not be prepared and that issuance of the amendments will have no significant adverse effect on the quality of the human environment.

For further details with respect to the action see (1) the application for amendments dated May 6, 1988, as supplemented by letters dated August 25 and December 7, 1988 (2) Amendment No. 69 to License No. NPF-10 and Amendment No. 38 to License No. NPF-15, (3) the Commission's related Safety Evaluation and (4)

the Commission's Environmental Assessment. All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street N.W., and at the General Library, University of California, P.O. Box 19557, Irvine, California 92713. A copy of items (2), (3) and (4) may be obtained upon request addressed to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Director, Division of Reactor Projects - III, IV, V and Special Projects.

Dated at Rockville, Maryland this 20th day of January, 1989.

FOR THE NUCLEAR REGULATORY COMMISSION

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

D. E. Hickman, Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

UNITED STATES NUCLEAR REGULATORY COMMISSIONSOUTHERN CALIFORNIA EDISON COMPANY, ET AL.DOCKET NOS. 50-361 AND 50-362SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment to Facility Operating License No. NPF-10 and Facility Operating License No. NPF-15 issued to Southern California Edison Company, San Diego Gas and Electric Company, the City of Riverside California and the City of Anaheim, California (the licensee), for operation of San Onofre Nuclear Generating Station, Units 2 and 3, located in San Diego County, California.

ENVIRONMENTAL ASSESSMENT

Identification of Proposed Action: The proposed amendments would incorporate proposed changes PCN-243 and PCN-244 described below.

Proposed change PCN-243 is a request to revise the following sections of the Technical Specifications for both units:

- a. Table 3.3.9, "Remote Shutdown Monitoring Instrumentation," to allow for plant instrument improvements;
- b. Section 3.3.3.7, "Fire Detection Instrumentation," to differentiate between early warning fire detectors and actuation fire detectors;
- c. Section 3.7.8.2, "Spray and/or Sprinkler Systems," to more clearly define required compensatory actions for inoperable spray and/or sprinkler systems;
- d. Section 3.7.8.3, "Fire Hose Stations," to more clearly define required compensatory actions for inoperable fire hose stations;

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- e. Section 3.7.9, "Fire Rated Assemblies," to comply with current NRC guidelines;
- f. Bases 3/4.3.3.7, "Fire Detection Instrumentation," to be consistent with b. above;
- g. Sections 4.7.8.2, 4.7.8.3, and 4.7.9.2 to change the current 18 month surveillance intervals to refueling outage intervals.

Proposed Change PCN-244 is a request to revise (1) License Conditions 2.C(14) and 2.C(12) of Units 2 and 3 respectively to reflect the revised fire protection program, and (2) License Conditions 2.G of both units to exempt fire protection program violations from the 24 hour reporting requirement.

The Need for the Proposed Action

The proposed changes are required to update the Technical Specifications and the License Conditions to reflect the fire protection program at San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 as described in the licensee's submittals and as approved by the NRC staff.

Environmental Impacts of the Proposed Action: The proposed action would not involve a significant change in the probability or consequences of any accident previously evaluated, nor does it involve a new or different kind of accident. Consequently, any radiological releases resulting from an accident would not be significantly greater than previously determined. The proposed amendments do not otherwise affect routine radiological plant effluents. Therefore, the Commission concludes that there are no significant radiological environmental impacts associated with the proposed amendments. The Commission also concludes that the proposed action will not result in a significant increase in individual or cumulative occupational radiation exposure.

With regard to nonradiological impacts, the proposed amendments do not affect nonradiological plant effluents and have no other environmental impact. Therefore, the Commission concludes that there are no significant nonradiological environmental impacts associated with the proposed amendments.

The Notice of Consideration of Issuance of Amendment and Opportunity for Hearing in connection with this action was published in the Federal Register on September 9, 1988 (53 FR 35138). No request for hearing or petition for leave to intervene was filed following this notice.

Alternatives to the Proposed Action: Because the Commission has concluded that there are no significant environmental impacts associated with the proposed action, there is no need to examine alternatives to the proposed action.

Alternative Use of Resources: This action does not involve the use of resources not previously considered in connection with the Final Environmental Statement related to operation of San Onofre Nuclear Generating Station, Units 2 and 3, dated April 1981 and its Errata dated June 1986.

Agencies and Persons Consulted: The NRC staff has reviewed the licensee's request that supports the proposed amendments. The NRC staff did not consult other agencies or persons.

FINDING OF NO SIGNIFICANT IMPACT

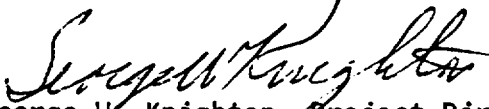
The Commission has determined not to prepare an environmental impact statement for the proposed amendments.

Based upon the foregoing environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment.

For further details with respect to this action, see the application for amendments dated May 6, 1988 and supplementary letter dated August 25, 1988 which are available for public inspection at the Commission's Public Document Room, 2120 L Street, N.W., Washington, D.C., and at the General Library, University of California, P.O. Box 19557, Irvine, California 92713.

Dated at Rockville, Maryland, this 12th day of October, 1988.

FOR THE NUCLEAR REGULATORY COMMISSION


George W. Knighton, Project Director
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

For further details with respect to this action, see the application for amendments dated May 6, 1988 and supplementary letter dated August 25, 1988 which are available for public inspection at the Commission's Public Document Room, 2120 L Street, N.W., Washington, D.C., and at the General Library, University of California, P.O. Box 19557, Irvine, California 92713.

Dated at Rockville, Maryland, this 12th day of October, 1988.

FOR THE NUCLEAR REGULATORY COMMISSION

George W. Knighton, Project Director
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

*See previous concurrence

*DRSP/PD5	*DRSP/PD5	*OGC	DRSP/PD5
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For further details with respect to this action, see the application for amendments dated May 6, 1988 and supplementary letter dated August 25, 1988 which are available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C., and at the General Library, University of California, P.O. Box 19557, Irvine, California 92713.

Dated at Rockville, Maryland, this day of October, 1988.

FOR THE NUCLEAR REGULATORY COMMISSION

George W. Knighton, Project Director
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IV, V and Special Projects
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ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Station Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Supervisor (or during his absence from the Control Room Area, a designated individual) shall be responsible for the Control Room command function. A management directive to this effect, signed by the Vice-President of Nuclear Operations shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

OFFSITE

6.2.1 Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR.
- b. The Station Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President, Nuclear Engineering, Safety, and Licensing and the Vice President and Site Manager shall have corporate responsibility for overall plant nuclear safety. The Vice President and Site Manager shall take any measures needed to ensure acceptable performance of the staff in operating and maintaining the plant to ensure nuclear safety. The Vice President, Nuclear Engineering, Safety and Licensing shall take any measures needed to ensure acceptable performance of the staff in providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

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ADMINISTRATIVE CONTROLSUNIT STAFF

- 6.2.2 a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Reactor Operator shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator shall be in the Control Room area identified as such on Table 6.2-1.
- c. A health physics technician[#] shall be on site when fuel is in the reactor.
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. A site Fire Brigade of at least 5 members shall be maintained onsite at all times.[#] The Fire Brigade shall not include the Shift Supervisor and the 2 other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.

[#]The health physics technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.