



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

February 16, 1989

Docket Nos.: 50-361 and 50-362

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

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

Gentlemen:

SUBJECT: PROPOSED AMENDMENT PCN-224, SAN ONOFRE NUCLEAR GENERATING STATION,
UNITS 2 AND 3 (TAC NOS. 66812 AND 66813)

By letter dated December 14, 1987 Southern California Edison (SCE) proposed to change the Technical Specifications (TS) for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3. The proposed amendments would revise TS 3/4.7.1.5, "Main Steam Line Isolation Valves (MSIVs)," to include operability requirements for the main feedwater isolation valves (MFIVs), the main feedwater backup isolation valves (MFBIVs), and the steam generator sample isolation valves (SGSIVs) and blowdown isolation valves (BIVs). They would also revise TS 3/4.7.1.2, "Auxiliary Feedwater System," to incorporate operability requirements for the auxiliary feedwater isolation valves (AFWIVs), the auxiliary feedwater control valves (AFWCVs), and the auxiliary feedwater bypass control valves (AFWBCVs).

We have reviewed your request and the supporting information. We do not agree with your justification for the proposed 72 hour action statement for the MFIVs. You state that "In general, where two redundant trains of equipment are provided, technical specification action statements allow one train to be out of service for a maximum of 72 hours....The main feedwater backup isolation valves provide a degree of redundancy to the MFIVs. Accordingly, a 72 hour action statement is proposed for the MFIVs and main feedwater backup isolation valves." However, you also noted that the operability requirements for the MSIVs are to ensure that no more than one steam generator will blow down in the event of a steam line rupture assuming a single failure. You go on to state that "equally important in mitigating the consequences of these events are the main feedwater isolation valves..." Your argument of the general case cannot be applied in this situation because the MFIV and the MFBIV in each feedwater line provide the same degree of protection against a steam line break as do the two MSIVs in the main steam lines. That is, either the MFIV or the MFBIV in the feedwater line to the broken steam generator must close to ensure that no more than one steam generator will blow down, just as either MSIV must close to ensure that

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Mssrs. Baskin and Cotton

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February 16, 1989

no more than one steam generator will blow down. Therefore, the action statements for the MFIVs and the MFBIVs should be identical to that for the MSIVs, since each provides the same degree of protection against the same accident. For this reason, the proposed changes are denied.

The Commission has filed the enclosed Notice of Denial of Application for Amendment with the Office of the Federal Register for publication.

Sincerely,



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

Enclosure:
Notice of Denial

cc: See next page

February 16, 1989

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original signed by

Donald E. Hickman, Project Manager
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Division of Reactor Projects - III,
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no more than one steam generator will blow down. Therefore, the action statements for the MFIVs and the MFBIVs should be identical to that for the MSIVs since each provide the same degree of protection against the same accident. For this reason, the proposed changes are denied.

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Mr. Kenneth P. Baskin
Southern California Edison Company

San Onofre Nuclear Generating
Station, Units 2 and 3

cc:

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UNITED STATES NUCLEAR REGULATORY COMMISSION

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL

DOCKET NOS. 50-361/362

NOTICE OF DENIAL OF AMENDMENTS TO
FACILITY OPERATING LICENSES AND OPPORTUNITY FOR HEARING

The U.S. Nuclear Regulatory Commission (the Commission) has denied a request by Southern California Edison Company, San Diego Gas and Electric Company, The City of Riverside, California and the City of Anaheim, California (licensees) for amendments to Facility Operating License Nos. NPF-10 and NPF-15, issued to the licensees, for operation of the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, located in San Diego County, California. The Notice of Consideration of Issuance of Amendments was published in the FEDERAL REGISTER on March 9, 1988 (53 FR 7602).

The amendments, as proposed by the licensees, would revise Technical Specification (TS) 3/4.7.1.5, "Main Steam Line Isolation Valves (MSIVs)," to include operability requirements for the main feedwater isolation valves (MFIVs), the main feedwater backup isolation valves (MFBIVs), and the steam generator sample isolation valves (SGSIVs) and blowdown isolation valves (BIVs). They would also revise TS 3/4.7.1.2, "Auxiliary Feedwater System System," to incorporate operability requirements for the auxiliary feedwater isolation valves (AFWIVs), the auxiliary feedwater control valves (AFWCVs), and the auxiliary feedwater bypass control valves (AFWBCVs).

The staff finds that the proposed 72 hour action statement for the MFIVs is not acceptable because the MFIV and the MFBIV in each feedwater line provide the same degree of protection against a steam line break as do the two MSIVs in the main steam lines. That is, either the MFIV or the MFBIV in the feedwater

line to the broken steam generator must close to ensure that no more than one steam generator will blow down, just as either MSIV must close to ensure that no more than one steam generator will blow down. Therefore, the action statements for the MFIVs and the MFBIIVs should be identical to that for the MSIVs (4 hours) since each provides the same degree of protection against the same accident. For this reason, the proposed changes have been denied.

By March 29, 1989, the licensees may demand a hearing with respect to the denial described above and any person 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 for the Commission, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Docketing and Service Branch, or may be delivered to the Commission's Public Document Room, 2120 L Street, N.W., Washington, D.C., by the above date.

A copy of any petitions should also be sent to the Office of the General Counsel, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, and to Charles R. Kocher, Esq., Southern California Edison Company, 2244 Walnut Grove Avenue, P.O. Box 800, Rosemead, California 91770, and Orrick, Herrington & Sutcliff, Attn: David R. Pigott, Esq., 600 Montgomery Street, San Francisco, California 94111.

For further details with respect to this action, see (1) the application for amendments dated December 14, 1987, and (2) the Commission's letter to the licensees dated February 16, 1989, 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 at Irvine, Irvine,

California 92713. A copy of Item (2) 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 16th day of February 1989.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in cursive script, appearing to read "Donald E. Hickman".

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