Docket Nos.: 50-361 and 50-362

> Mr. Harold B. Ray Vice President Southern California Edison Company Irvine Operations Center 23 Parker Irvine, California 92718

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: ISSUANCE OF NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENTS SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 (TAC NOS. 74177 AND 74178)

Enclosed for your information is a Notice of Consideration of Issuance of Amendments to Facility Operating Licenses and Opportunity for Hearing. The notice relates to your request of July 31, 1989, to revise Technical Specification 3/4.1.3.4, "CEA Drop Time." (PCN-295).

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

Sincerely,

original signed by George Knighton for Donald Hickman

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

Enclosure: Notice		
cc w/enclosure: See next page		
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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

August 30, 1989

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

Enclosure: Notice

cc w/enclosure: See next page Mr. Harold B. Ray Southern California Edison Company

## cc:

Charles R. Kocher, Esq. James A. Beoletto, Esq. Southern California Edison Company Irvine Operations Center 23 Parker Irvine, California 92718

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Mr. Don Womeldorf Chief Environmental Management Branch California Department of Health 714 P Street, Room 616 Sacramento, California 95814 San Onofre Nuclear Generating Station, Units 2 and 3

Mr. Mark Medford Southern California Edison Company Irvine Operations Center 23 Parker Irvine, California 92718

Mr. Robert G. Lacy Manager, Nuclear Department San Diego Gas & Electric Company P. O. Box 1831 San Diego, California 92112

Mr. John Hickman Senior Health Physicist Environmental Radioactive Mgmt. Unit Environmental Management Branch State Department of Health Services 714 P Street, Room 616 Sacramento, California 95814

Resident Inspector, San Onofre NPS c/o U.S. Nuclear Regulatory Commission Post Office Box 4329 San Clemente, California 92672

Mayor, City of San Clemente San Clemente, Californía 92672

Regional Administrator, Region V U.S. Nuclear Regulatory Commission 1450 Maria Lane/Suite 210 Walnut Creek, California 94596

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

Mr. F. B. Marsh, Project Manager Bechtel Power Corporation P.O. Box 60860 Terminal Annex Los Angeles, California 90060

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## UNITED STATES NUCLEAR REGULATORY COMMISSION SOUTHERN CALIFORNIA EDISON COMPANY, ET AL DOCKET NOS. 50-361 AND 50-362 NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENTS TO FACILITY OPERATING LICENSES AND OPPORTUNITY FOR HEARING

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The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of amendments to Facility Operating License Nos. NPF-10 and NPF-15 issued to Southern California Edison Company (SCE), San Diego Gas and Electric Company, the City of Riverside, California and the City of Anaheim, California (the licensees), for operation of San Onofre Nuclear Generating Station, Units 2 and 3 located in San Diego County, California. The request for amendments was submitted by letter dated July 31, 1989, and identified as Proposed Change PCN-295.

The proposed change would revise Technical Specification 3/4.1.3.4, "CEA Drop Time," and its Bases, to use both an arithmetic average Control Element Assembly (CEA) drop time and a maximum individual CEA drop time. The maximum individual CEA drop time restriction would be used to limit the CEA drop time distribution from the arithmetic average.

The requirements of Technical Specification 3/4.1.3.4 ensure that actual drop times for full length CEA's are consistent with the drop time assumed in the accident and transient analyses. The drop times for full length CEA's, from the fully withdrawn position until the CEA reaches its 90% insertion position, are measured with the reactor coolant average temperature greater than 520°F and all reactor coolant pumps running. CEA drop times are measured following each removal and reinstallation of the reactor vessel head; following

8909140023 890830 PDR ADOCK 05000361 PDC any maintenance on, or modification to the CEA drive system which could affect the drop time of those specific CEA's; and at least once per refueling interval.

Prior to SONGS Unit 2 Cycle 4 start-up, CEA drop times were measured individually using a visicorder to simultaneously monitor CEA position (from the reed switch position transmitter) and power to the upper gripper coil. The CEA was withdrawn from the core to its full out position and dropped by opening its individual circuit breaker. From the visicorder chart, the time from the interruption of power to 90% CEA insertion could be determined.

Beginning with the SONGS Unit 2 Cycle 4 start-up, a new method of measuring CEA drop times was instituted. This method uses special software (CEA Drop Time Test or CDTT software) loaded into one of the Control Element Assembly Calculators (CEAC's). The CDTT software initiates a Core Protection Calculator (CPC) trip and simultaneously monitors the positions of all 91 CEA's (83 full length and 8 part length) as a function of time. The data obtained is then analyzed to determine individual CEA drop times. Under this method, it is important to note that power is interrupted at the reactor trip breakers rather than at the individual breakers as in the previous method. This new method more accurately reflects the operation of the reactor protection system during a scram.

The CEA drop times measured using the new method during SONGS Unit 2 Cycle 4 start-up were unexpectedly longer than those measured by the visicorder method. This is due to the longer time constant for dissipation of the gripper coil stored energy when tripped by the reactor trip breakers than when tripped by the individual circuit breakers. Subsequently, SCE requested a Technical Specification change to revise the drop time to the current limit of 3.2 seconds. In addition, Core Operating Limits Supervisory System (COLSS) and CPC

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penalty factors were installed to account for the increased CEA drop time. All the design basis events were re-analyzed at that time to support the change to 3.2 seconds.

The SONGS Unit 3 Cycle 4 CEA drop time test found that the margin between the slowest CEA and the Technical Specification limit of 3.2 seconds was small. To increase the margin between the Technical Specification value and the measured time, the licensees have proposed to amend the CEA drop time specification to incorporate the use of an arithmetic average CEA drop time with a restriction on the maximum individual CEA drop time. In addition, the proposed amendment would expand the Technical Specifications to have a range of average and maximum individual drop times.

The proposed specification would provide three average CEA drop times of 3.0, 3.2, and 3.4 seconds, with corresponding maximum individual CEA drop times of 3.2, 3.4, and 3.6 seconds. It would also provide COLSS margin and CPC margin-to-trip adjustment factors, and a penalty would be applied (adjustment factor greater than 1.0) if the average time is longer than 3.2 seconds. The plant would not enter either Mode 2 or 1 if either the average CEA drop time is greater than 3.4 seconds or the maximum individual CEA drop time is greater than 3.4 seconds or the maximum individual CEA drop time is greater than 3.6 seconds.

Before issuance of the proposed license amendments, the Commission will have made findings required by the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations.

By October 10, 1989 the licensees may file a request for a hearing with respect to issuance of the amendments to the subject facility operating licenses, and any person whose interest may be affected by this proceeding and who wishes to participate as a party in the proceeding must file a written

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

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

Not later than fifteen (15) days prior to the first pre-hearing conference scheduled in the proceeding, a petitioner shall file a supplement to the

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petition to intervene which must include a list of the contentions which are sought to be litigated in the matter, and the bases for each contention set forth with reasonable specificity. Contentions shall be limited to matters within the scope of the amendments under consideration. A petitioner who fails to file such a supplement which satisfies these requirements with respect to at least one contention will not be permitted to participate as a party.

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

A request for a hearing or a petition for leave to intervene shall be filed with the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, DC 20555, Attention: Docketing and Service Branch, or may be delivered to the Commission's Public Document Room, 2120 L Street, NW, Washington, DC, by the above date. Where petitions are filed during the last ten (10) days of the notice period, it is requested that the petitioner or representative for the petitioner promptly inform the Commission by a toll-free telephone call to Western Union at 1-(800)325-6000 (in Missouri 1-(800)342-6700). The Western Union operator should be given Datagram Identification Number 3737 and the following message addressed to George W. Knighton: petitioner's name and telephone number; date petition was mailed; plant name; and publication date and page number of this FEDERAL REGISTER notice. A copy of the petition should also be sent to the Office of the General Counsel, U.S. Nuclear Regulatory Commission, Washington, DC 20555, and to Mr. Charles R. Kocher, Esq., Southern California Edison Company, 2244 Walnut Grove Avenue, P.O. Box 800, Rosemead,

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California 91770 and Orrick, Herrington and Sutcliffe, Attention: David R. Pigott, Esq., 600 Montgomery Street, San Francisco, California 94111, attorneys for the licensees.

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

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

For further details with respect to this action, see the application for amendments which is available for public inspection at the Commission's Public Document Room, 2120 L Street NW, Washington, DC, and at the General Library, University of California at Irvine, Irvine, California 92713.

Dated at Rockville, Maryland, this 30th day of August . 1989.

FOR THE NUCLEAR REGULATORY COMMISSION

when

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

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