Docket Nos. 50-361 and 50-362

> Mr. Harold B. Ray Senior Vice President Southern California Edison Co. Irvine Operations Center 23 Parker Street

Irvine, California 92718

June 17, 1991

Mr. Gary D. Cotton Senior Vice President Engineering and Operations San Diego Gas & Electric Co. 101 Ash Street San Diego, California 92112

#### Gentlemen:

ISSUANCE OF AMENDMENT NOS. 95 AND 85 TO FACILITY OPERATING SUBJECT: LICENSE NOS. NPF-10 AND NPF-15 FOR THE SAN ONOFRE NUCLEAR

GENERATING STATION, UNIT NOS. 2 AND 3 (TAC NOS. 80236 AND 80237)

The Commission has issued the enclosed Amendment Nos.  $95\,$  and  $85\,$  to Facility Operating License Nos. NPF-10 and NPF-15 for San Onofre Nuclear Generating Station, Unit Nos. 2 and 3. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated May 2, 1991, designated by you as PCN-352.

These amendments revise TS 3/4.7.6 and associated Bases, "Snubbers," in accordance with Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated December 11, 1990. Specifically, TS 4.7.6.b, "Visual Inspections" and TS 4.7.6.c, "Visual Inspection Acceptance Criteria," are revised to remove the existing snubber visual examination schedule and replace it with a refueling outage based visual examination schedule as delineated in Generic Letter 90-09.

A copy of our related Safety Evaluation is also enclosed. The notice of issuance will be included in the Commission's next regular biweekly Federal Register notice.

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#### Enclosures:

1. Amendment No. 95 to NPF-10

Amendment No. 85 to NPF-15

Safety Evaluation

cc w/enclosures: See next page

Sincerely,

Original signed by: Lawrence E. Kokajko, Project Manager Project Directorate V Division of Reactor Projects III/IV/V Office of Nuclear Reactor Regulation

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Messrs. Ray and Cotton Southern California Edison Company

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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 NO. 2

## AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 95 License No. NPF-10

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Southern California Edison Company, San Diego Gas and Electric Company, the City of Riverside, California, and the City of Anaheim, California (licensees) (the licensee) dated May 2, 1991, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and 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;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - 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.

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

## (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 95, are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and must be fully implemented no later than 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

James E. Dyer, Director Project Directorate V

Janes E. Oyev

Division of Reactor Projects III/IV/V Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: June 17, 1991

## ATTACHMENT TO LICENSE AMENDMENT NO. 95

## FACILITY OPERATING LICENSE NO. NPF-10

## DOCKET NO. 50-361

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE	INSERT	
3/4 7-16	3/4 7-16	
	3/4 7 <b>-1</b> 6a	
	3/4 7-16b	
3/4 7-17	3/4 7-17	
B 3/4 7-5	B 3/4 7-5	

#### 3/4.7.6 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

3.7.6 All snubbers shall be OPERABLE. The only snubbers excluded from this requirement are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

#### ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.6.g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

## SURVEILLANCE REQUIREMENTS

4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

## a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

## b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7-2. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in Table 4.7-2 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before amendment 95.

### SURVEILLANCE REQUIREMENTS (Continued)

## TABLE 4.7-2 SNUBBER VISUAL INSPECTION INTERVAL

#### NUMBER OF INOPERABLE SNUBBERS

Position or Category (Notes 1 and 2)	Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2 5	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greate	r 29	56	109

- Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of INOPERABLE snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must make and document that decision before any inspection and shall use that decision as the basis upon which to determine the next inspection interval for that category.
- Note 2: Interpolation between population or category sizes and the number of INOPERABLE snubbers is permissible. Use next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of INOPERABLE snubbers as determined by interpolation.
- Note 3: If the number of INOPERABLE snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.
- Note 4: If the number of INOPERABLE snubbers is equal to or less than the number in Column B, but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

### SURVEILLANCE REQUIREMENTS (Continued)

- Note 5: If the number of INOPERABLE snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of INOPERABLE snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of INOPERABLE snubbers found during the previous interval and the number in Column B to the difference in the numbers in Columns B and C.
- Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

## c. <u>Visual Inspection Acceptance Criteria</u>

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, and (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to (a) the component or pipe and (b) the snubber anchorage are secure. Snubbers which appear INOPERABLE as a result of visual inspections shall be classified as INOPERABLE and may be reclassified OPERABLE for the purpose of establishing the next visual inspection interval, provided that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specification 4.7.6.e or 4.7.6.f, as applicable. However, when a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined INOPERABLE and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers found connected to an INOPERABLE common hydraulic fluid reservoir shall be counted as INOPERABLE snubbers for determining the next inspection interval. A review and evaluation shall be performed and documented to justify continued operation with an INOPERABLE snubber. If continued operation cannot be justified, the snubber shall be declared INOPERABLE and the ACTION requirements shall be met.

#### 3/4.7.6 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the Reactor Coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety related system.

For visual inspection snubbers may be categorized into two (2) groups, those accessible and those inaccessible during reactor operation. For functional testing, snubbers are categorized into types by design and manufacturer, irrespective of capacity. For example, Pacific Scientific snubbers are divided into four types corresponding to different design features: PSA 1/4 and 1/2 are one type; PSA 1, 3, and 10 are another; PSA 6 is another; and PSA 35 and 100 are a fourth type.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies based upon the number of INOPERABLE snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories and the previous inspection interval as specified in NRC Generic Letter 90-09, "Alternative Requirements For Snubber Visual Inspection Intervals and Corrective Actions." Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at refueling intervals.

If a review and evaluation of an INOPERABLE snubber is performed and documented to justify continued operation and provided that all design criteria are met with the INOPERABLE snubber, then the INOPERABLE snubber would not need to be restored or replaced as stated in TS 3/4.7.6 "ACTION."

Hydraulic snubbers and mechanical snubbers may each be treated as a different entity for the above surveillance programs.



# 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 NO. 3

## AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 85 License No. NPF-15

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Southern California Edison Company, San Diego Gas and Electric Company, the City of Riverside, California, and the City of Anaheim, California (licensees) (the licensee) dated May 2, 1991, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and 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;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - 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 license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-15 is hereby amended to read as follows:

## (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 85, are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and must be fully implemented no later than 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

James E. Dyer, Director Project Directorate V

Janes & Oyer

Division of Reactor Projects III/IV/V Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: June 17, 1991

## ATTACHMENT TO LICENSE AMENDMENT NO. 85

## FACILITY OPERATING LICENSE NO. NPF-15

## **DOCKET NO. 50-362**

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE	INSERT	
3/4 7-17	3/4 7-17	
	3/4 7 <b>-</b> 17a	
	3/4 7-17b	
3/4 7-18	3/4 7-18	
B 3/4 7-5	B 3/4 7-5	

#### 3/4.7.6 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

3.7.6 All snubbers shall be OPERABLE. The only snubbers excluded from this requirement are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

<u>APPLICABILITY</u>: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

#### **ACTION:**

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.6.g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

## SURVEILLANCE REQUIREMENTS

4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

## a. <u>Inspection Types</u>

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

## b. <u>Visual Inspections</u>

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7-2. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in Table 4.7-2 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before amendment 85 .

## TABLE 4.7-2 SNUBBER VISUAL INSPECTION INTERVAL

#### NUMBER OF INOPERABLE SNUBBERS

or Category	Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80 100	<b>0</b>	0	2
100	U	7	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
<b>75</b> 0	20	40	78
1000 or greater	29	56	109

- Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of INOPERABLE snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must make and document that decision before any inspection and shall use that decision as the basis upon which to determine the next inspection interval for that category.
- Note 2: Interpolation between population or category sizes and the number of INOPERABLE snubbers is permissible. Use next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of INOPERABLE snubbers as determined by interpolation.
- Note 3: If the number of INOPERABLE snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.
- Note 4: If the number of INOPERABLE snubbers is equal to or less than the number in Column B, but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

## SURVEILLANCE REQUIREMENTS (Continued)

- Note 5: If the number of INOPERABLE snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of INOPERABLE snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of INOPERABLE snubbers found during the previous interval and the number in Column B to the difference in the numbers in Columns B and C.
- Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

## c. <u>Visual Inspection Acceptance Criteria</u>

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, and (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to (a) the component or pipe and (b) the snubber anchorage are secure. Snubbers which appear INOPERABLE as a result of visual inspections shall be classified as INOPERABLE and may be reclassified OPERABLE for the purpose of establishing the next visual inspection interval, provided that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specification 4.7.6.e or 4.7.6.f, as applicable. However, when a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined INOPERABLE and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers found connected to an INOPERABLE common hydraulic fluid reservoir shall be counted as inoperable snubbers for determining the next inspection interval. A review and evaluation shall be performed and documented to justify continued operation with an INOPERABLE snubber. If continued operation cannot be justified, the snubber shall be declared INOPERABLE and the ACTION requirements shall be met.

## d. Functional Tests\*

At least once per refueling interval during shutdown, a representative sample of at least 15% of the total of each type of snubber in use in the plant shall be functionally tested either in place or in a bench test. For each snubber of a type of that does not meet the functional test acceptance criteria of Specification 4.7.6.e or 4.7.6.f, an additional 15% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

- The first snubber away from each reactor vessel nozzle
- 2. Snubbers within 5 feet of heavy equipment (valve, pump, turbine motor, etc.)
- 3. Snubbers within 10 feet of the discharge from safety relief valve.

<sup>\*</sup>Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

#### 3/4.7.6 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the Reactor Coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety related system.

For visual inspection snubbers may be categorized into two (2) groups, those accessible and those inaccessible during reactor operation. For functional testing, snubbers are categorized into types by design and manufacturer, irrespective of capacity. For example, Pacific Scientific snubbers are divided into four types corresponding to different design features: PSA 1/4 and 1/2 are one type; PSA 1, 3, and 10 are another; PSA 6 is another; and PSA 35 and 100 are a fourth type.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies based upon the number of INOPERABLE snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories and the previous inspection interval as specified in NRC Generic Letter 90-09, "Alternative Requirements For Snubber Visual Inspection Intervals and Corrective Actions." Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at refueling intervals.

If a review and evaluation of an INOPERABLE snubber is performed and documented to justify continued operation and provided that all design criteria are met with the INOPERABLE snubber, then the INOPERABLE snubber would not need to be restored or replaced as stated in TS 3/4.7.6 "ACTION."

Hydraulic snubbers and mechanical snubbers may each be treated as a different entity for the above surveillance programs.



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

### SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 95 AND 85 TO

FACILITY OPERATING LICENSE NOS. NPF-10 AND NPF-15

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NOS. 2 AND 3

DOCKET NOS. 50-361 AND 50-362

#### 1.0 INTRODUCTION

By letter dated May 2, 1991, Southern California Edison Company, et al., (SCE or the licensee) requested changes to the Technical Specifications (TS) for Facility Operating License Nos. NPF-10 and NPF-15 that authorize operation of San Onofre Nuclear Generating Station, Unit Nos. 2 and 3 in San Diego County, California. The licensee proposed to modify TS 3/4.7.6, "Snubbers," in accordance with Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated December 11, 1990.

Specifically, the licensee proposes to modify TS 4.7.6.b, "Visual Inspections," and TS 4.7.6.c, "Visual Inspection Acceptance Criteria." The licensee requests to remove the snubber visual examination schedule in the existing TS and replace it with a refueling outage based visual examination schedule as delineated in GL 90-09. This request, in accordance with GL 90-09, is a TS line item improvement.

#### 2.0 EVALUATION

The snubber visual examination schedule in the existing Technical Specifications is based on the permissible number of inoperable snubbers found during the visual examination. Because the existing snubber visual examination schedule is based only on the absolute number of inoperable snubbers found during the visual examinations irrespective of the total population of snubbers, licensee's with a large snubber population find the visual examination schedule excessively restrictive. The purpose of the alternative visual examination schedule is to allow the licensee to perform visual examinations and corrective actions during plant outages without reduction of the confidence level provided

9106250239 910617 PDR ADOCK 05000361 P PDR by the existing visual examination schedule. The new visual examination schedule specifies the permissible number of inoperable snubbers for various snubber populations. The basic examination interval is the normal fuel cycle, which is 24 months for San Onofre Unit Nos. 2 and 3. This interval may be extended to as long as twice the fuel cycle or reduced to as small as two-thirds of the fuel cycle depending on the number of unacceptable snubbers found during the visual examination. The examination interval may vary by  $\pm 25$  percent to coincide with the actual outage.

In the event one or more snubbers are found inoperable during a visual examination, the Limiting Conditions for Operation (LCO) in the present TS require the licensee to restore or replace the inoperable snubber(s) to operable status within 72 hours and perform an engineering evaluation on the attached component, or declare the attached system inoperable and follow the appropriate action statement for that system. This LCO will remain in the TS. However, the permissible number of inoperable snubber(s) and the subsequent visual examination interval will now be determined in accordance with the new visual examination schedule as delineated in GL 90-09. As noted in the guidance, certain corrective actions may have to be performed depending on the number of inoperable snubbers found. All requirements, for corrective actions and evaluations associated with the use of visual examination schedule as stated in the Generic Letter 90-09 shall be included in the TS.

The licensee has proposed changes to TS 4.7.6.b and 4.7.6.c that are consistent with the guidance provided in Generic Letter 90-09 for the replacement of the snubber visual examination schedule. On the basis of its review of this matter, the staff finds that the proposed changes to the Technical Specifications for San Onofre Nuclear Generating Station, Unit Nos. 2 and 3, are acceptable.

## 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the California State official was notified of the proposed issuance of the amendment. The State official had no comments.

## 4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (56 FR 22477). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

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### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, 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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: J. Rajan

L.E. Kokajko

Date: June 17, 1991