

50-361/362



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

WASHINGTON, D.C. 20555-0001

December 3, 1996

Mr. Harold B. Ray
Executive Vice President
Southern California Edison Company
P.O. Box 128
San Clemente, California 92674-0128

SUBJECT: ISSUANCE OF AMENDMENT FOR SAN ONOFRE NUCLEAR GENERATING STATION,
UNIT NO. 2 (TAC NO. M96910) AND UNIT NO. 3 (TAC NO. M96911)

Dear Mr. Ray:

The Commission has issued the enclosed Amendment No. 134 to Facility Operating License No. NPF-10 and Amendment No. 123 to Facility Operating License No. NPF-15 for San Onofre Nuclear Generating Station (SONGS), Unit Nos. 2 and 3. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated October 11, 1996.

These amendments revise TS 3.9.6, "Refueling Water Level," for SONGS Units 2 and 3. The proposed change is required to restore certain provisions of the SONGS Units 2 and 3 operating practice that were not incorporated during the conversion to the improved TS (Amendment Nos. 127 and 116, dated February 9, 1996).

This is the second TS amendment issued by the staff to correct errors that occurred during the conversion process to the improved TS, and there are additional conversion errors that will require TS amendments in the future to correct. These errors occurred even though Southern California Edison (SCE) certified, in its letter dated November 16, 1995, that the improved TS were in accordance with and applicable to the design of the SONGS Units 2 and 3. Please provide the staff with an analysis of why these errors were not detected during the review stage, and what measures should be established to prevent reoccurrence of this situation in future proposed changes to the TS.

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

Sincerely,

Original Signed By

Mel B. Fields, Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-361
and 50-362

Enclosures: 1. Amendment No. 134 to NPF-10
2. Amendment No. 123 to NPF-15
3. Safety Evaluation

cc w/encls: See next page

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Mr. Harold B. Ray

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December 3, 1996

cc w/encl:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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. 134
License No. NPF-10

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee) dated October 11, 1996, 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.

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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-10 is 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. 134, 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 to be implemented within 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Mel B. Fields, Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: December 3, 1996

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 134 TO FACILITY OPERATING LICENSE NO. NPF-10

DOCKET NO. 50-361

Revise Appendix A Technical Specifications by removing the page identified below and inserting the enclosed page. The revised page is identified by Amendment number and contains marginal lines indicating the areas of change.

REMOVE

3.9-10

INSERT

3.9-10

3.9 REFUELING OPERATIONS

3.9.6 Refueling Water Level

LCO 3.9.6 Refueling water level shall be maintained \geq 23 ft above the top of reactor vessel flange.

-----NOTE-----

Water level may be lowered to a minimum of 23 feet above the top of the fuel for movement of four finger CEAs, coupling and uncoupling of CEA extension shafts or for verifying the coupling and uncoupling.

APPLICABILITY: During movement of fuel assemblies or CEAs within the reactor pressure vessel when either the fuel assemblies being moved or the fuel assemblies seated within the reactor pressure vessel are irradiated.
During movement of irradiated fuel assemblies within containment.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Refueling water level not within limit.	A.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u> A.2 Suspend movement of irradiated fuel assemblies within containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.9.6.1 The refueling water level shall be determined to be at least its minimum required depth.	24 hours



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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. 123
License No. NPF-15

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee) dated October 11, 1996, 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.

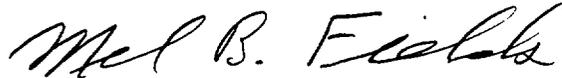
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-15 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 123, 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 to be implemented within 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Mel B. Fields, Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: December 3, 1996

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 123 TO FACILITY OPERATING LICENSE NO. NPF-15

DOCKET NO. 50-362

Revise Appendix A Technical Specifications by removing the page identified below and inserting the enclosed page. The revised page is identified by Amendment number and contains marginal lines indicating the areas of change.

REMOVE

3.9-10

INSERT

3.9-10

3.9 REFUELING OPERATIONS

3.9.6 Refueling Water Level

LCO 3.9.6 Refueling water level shall be maintained \geq 23 ft above the top of reactor vessel flange.

-----NOTE-----

Water level may be lowered to a minimum of 23 feet above the top of the fuel for movement of four finger CEAs, coupling and uncoupling of CEA extension shafts or for verifying the coupling and uncoupling.

APPLICABILITY: During movement of fuel assemblies or CEAs within the reactor pressure vessel when either the fuel assemblies being moved or the fuel assemblies seated within the reactor pressure vessel are irradiated.
During movement of irradiated fuel assemblies within containment.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Refueling water level not within limit.	A.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u> A.2 Suspend movement of irradiated fuel assemblies within containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.9.6.1 The refueling water level shall be determined to be at least its minimum required depth.	24 hours



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 134 TO FACILITY OPERATING LICENSE NO. NPF-10
AND AMENDMENT NO. 123 TO FACILITY OPERATING LICENSE NO. 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, UNITS 2 AND 3
DOCKET NOS. 50-361 AND 50-362

1.0 INTRODUCTION

By application dated October 11, 1996, Southern California Edison Company (SCE or the licensee) requested changes to the Technical Specifications (Appendix A to Facility Operating License Nos. NPF-10 and NPF-15) for San Onofre Nuclear Generating Station (SONGS), Unit Nos. 2 and 3. The proposed changes would revise Technical Specification (TS) 3.9.6, "Refueling Water Level," for SONGS Units 2 and 3. The proposed change is required to restore certain provisions of the SONGS Units 2 and 3 operating practice that were not incorporated during the conversion to the improved TS (Amendment Nos. 127 and 116, dated February 9, 1996). The restored provisions will allow the refueling water level to be lowered during movement of four finger control element assemblies (CEAs), coupling and uncoupling of CEA extension shafts, and verification of the coupling and uncoupling process.

2.0 DISCUSSION

NRC Amendment Nos. 127 and 116 approved a license amendment request that adopted the recommendations of NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants." During preparation of the procedure changes necessary to implement the improved TS, the licensee identified certain provisions of the previous TS that were not properly incorporated into the improved TS.

Improved TS 3.9.6, "Refueling Water Level," requires a minimum refueling water level of 23 feet above the reactor vessel flange, thus ensuring that the radiological consequences of a postulated fuel handling accident inside the containment are within acceptable limits.

The previous specification, TS 3/4.9.10, "Water Level--Reactor Vessel," similarly required that at least 23 feet of water be maintained over the top of the reactor pressure vessel flange. A footnote to this TS clarified that the water level may be lowered to a minimum of 23 feet above the top of the fuel for movement of four finger CEAs, coupling and uncoupling of CEA extension shafts, or for verifying the coupling and uncoupling of CEAs. This footnote was not included in improved TS 3.9.6 because the licensee incorrectly believed it to be adequately addressed by the new words in the Applicability Statement.

The proposed change would restore the footnote because the licensee has determined that it is not clearly addressed by improved TS 3.9.6. Specifically, a note would be added to modify Limiting Condition for Operation (LCO) 3.9.6 to clearly allow that the refueling water level may be lowered to a minimum of 23 feet above the top of the fuel for movement of four finger CEAs, coupling and uncoupling of CEA extension shafts, or for verifying the coupling and uncoupling of CEAs. The proposed change would also revise the applicability of TS 3.9.6 to be consistent with this change. The change would replace the portion of the applicability related to core alterations with the phrase "During movement of fuel assemblies or CEAs within the reactor pressure vessel when either the fuel assemblies being moved or the fuel assemblies seated within the reactor pressure vessel are irradiated."

3.0 EVALUATION

During core alterations and during movement of irradiated fuel assemblies, the water level over the top of the fuel is an initial condition design parameter in the analysis of the fuel handling accident in containment postulated by Regulatory Guide (RG) 1.25, "Assumptions Used for Evaluating the Potential Radiological Consequences of a Fuel Handling Accident in the Fuel Handling and Storage Facility for Boiling and Pressurized Water Reactors (Safety Guide 25)." RG 1.25 specifies a minimum water depth of 23 feet between the top of the damaged fuel rods and the fuel pool surface as one of the regulatory position assumptions.

The requirement to maintain the water level 23 feet above the reactor vessel flange assures that there will be a minimum of 23 feet of water over a postulated dropped fuel assembly. Since the fuel assemblies would be seated in the reactor vessel during movement of four finger CEAs, coupling and uncoupling of CEA extension shafts, or for verifying the coupling and uncoupling of CEAs, the proposed reduction in water level to 23 feet above the top of the fuel during these activities continues to satisfy the RG 1.25 regulatory position assumption of 23 feet of water above the fuel.

The proposed TS change is acceptable, since it does not change the water depth regulatory position assumption of RG 1.25, and does not result in any changes in the assumptions previously used by both the licensee and the staff in analyzing the potential radiological consequences of a fuel handling accident.

4.0 STATE CONSULTATION

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

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. 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 (61 FR 56251). 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.

6.0 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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Mel Fields

Date: December 3, 1996