JUN 7 1984

MEMORANDUM FOR: James R. Miller, Chief
Operating Reactors Branch No. 3
Division of Licensing

FROM: George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing

DISTRIBUTION
Docket File 50-361
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SUBJECT: REQUEST FOR PUBLICATION IN MONTHLY FR NOTICE - NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENTS TO FACILITY OPERATING LICENSE AND PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION AND OPPORTUNITY FOR A HEARING

Southern California Edison Company, et al, Docket Nos. 50-361, and 50-362

San Onofre Nuclear Generating Station, Units 2 and 3, San Diego County, California

Date of amendment request: July 23, 1982, August 16, 1982, December 17, 1982, January 28, 1983, January 25, 1984, and April 13, 1984 (reference PCN-004)

Description of amendment request: The amendments would revise Table 4.3-2 of Technical Specification 3/4.3.2, Engineered Safety Features Actuation System (ESFAS) Instrumentation. Technical Specification 3/4.3.2 requires that the ESFAS instrumentation channels be operable, and defines a number of functional tests and response time tests that must be periodically conducted in order to assure such operability. Table 4.3-2 defines the frequency and operational modes for which surveillance must be conducted to verify operability of each of several types of ESFAS Instrumentation. Specifically, Table 4.3-2 requires semi-annual testing of 102 ESFAS subgroup relays associated with the actuation logic for the Safety

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Injection Actuation System (SIAS), Containment Spray Actuation System (CSAS), Containment Isolation Actuation System (CIAS), Main Steam Isolation System (MSIS), Recirculation Actuation System (RAS), Containment Cooling Actuation System (CCAS) and Emergency Feedwater Actuation System (EFAS). Note (4) of Table 4.3-2 requires that this semi-annual testing include energization/deenergization of each subgroup relay. Energization/deenergization of a subgroup relay necessarily results in actuation of the equipment controlled by the relay. Actuation during power operation of equipment associated with 23 of the 102 ESFAS subgroup relays will result in a plant trip or place the plant in an unsafe configuration. As a result, testing of these relays in accordance with note (4) of the existing Technical Specification requires a plant shutdown.

The proposed change would revise note (4) of Table 4.3-2 to exempt from testing during plant operation the 23 subgroup relays associated with equipment which cannot be safely actuated during plant operation or would trip the plant. The proposed change would require testing of each of these 23 relays during each cold shutdown of duration exceeding 24 hours unless the relay was tested during the previous six months. Since the maximum operating time between refuelings is 18 months, the maximum interval between testing of subgroup relays exempted from testing during power operation by

the proposed change is 18 months, although it may be less. Therefore, the proposed change will result in a change in the maximum surveillance interval of the 23 affected relays from 6 months to 18 months.

Basis for proposed no significant hazards consideration determination: The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (vi) relates to a change which either may result in some increase in the probability or consequences of a previously-analyzed accident or may in some way reduce a safety margin, but where the results of the change are clearly within all acceptance criteria with respect to the system or component specified in the Standard Review Plan (SRP). Section 7.3 of the Standard Review Plan references Regulatory Guide 1.22, "Periodic Testing of Protection System Actuation Functions," which recommends that provisions be made to accomodate periodic testing of ESFAS subgroup relays at power. However, where the subgroup relay actuates equipment which will trip the plant or which cannot be safely operated at power, Regulatory Guide 1.22 provides for exceptions to this requirement where it can be demonstrated that relay assignments have been made in a manner which minimizes the number which cannot be tested at power.

In this case, the relay assignments have been made such that only 23 out of 102 relays cannot be tested at power. The SRP acceptance criteria are satisfied by the proposed change in that the number of relays which cannot be tested at power is minimized and that periodic testing (with a maximum interval between tests of 18 months) is still required. Thus, the proposed change is similar to example (vi) of 48 FR 14870. Therefore, the Commission proposes to determine that these changes do not involve a significant hazards consideration.

Local Public Document Room location: San Clemente Library, 242 Avenida Del Mar, San Clemente, California 92672

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NRC Branch Chief: George W. Knighton

ORIGINAL SIGNED BY

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cc: P. Kreutzer

*See previous concurrences

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5/15/84	5/16/84	5/24/84	5/30/84