

January 10, 1985

Docket Nos.: 50-361
and 50-362

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Gentlemen:

Subject: Issuance of Notices of Consideration of Issuance of Amendments

Enclosed for your information are copies of two Notices of Consideration of Issuance of Amendments to Facility Operating Licenses and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing. One relates to your submittals of February 29, April 2, September 11, October 1 and 3, 1984, concerning proposed Technical Specification changes concerning reactor protection instrumentation and electrical power sources (PCN 85 and PCN 142); the other relates to your submittals of July 2, August 7 and October 3, 1984, concerning proposed Technical Specification changes on DNBR Margin and Reactor Protective Instrumentation and their bases (PCN 52). These Notices were published in the Federal Register on December 31, 1984.

Sincerely,



Harry Rood, Project Manager
Licensing Branch No. 3
Division of Licensing

Enclosure:
Federal Register Notices

cc: See next page

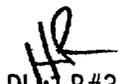
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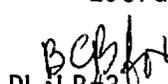
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Government Publications Section
Library & Courts Building
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UNITED STATES NUCLEAR REGULATORY COMMISSIONSOUTHERN CALIFORNIA EDISON COMPANY, ET AL.DOCKET NO. 50-361

NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENTS TO
FACILITY OPERATING LICENSES AND PROPOSED NO SIGNIFICANT HAZARDS
CONSIDERATION DETERMINATION AND OPPORTUNITY FOR HEARING

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, San Diego Gas and Electric Company, The City of Riverside, California and The City of Anaheim, California (the licensees), for operation of the San Onofre Nuclear Generating Station, Units 2 and 3 located in San Diego County, California.

The amendments would revise the technical specifications relating to reactor protection instrumentation and electrical power sources (Reference PCN-85 and PCN-142) in accordance with the licensees' applications for amendment dated February 29, April 2, September 11, October 1 and October 3, 1984.

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

The Commission has made a proposed determination that the request for amendments involves no significant hazards consideration. Under the Commission's regulations in 10 CFR 50.92, this means that operation of the facilities in accordance with the proposed amendments would not (1) involve significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident

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previously evaluated; or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of 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 to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan: for example, a change resulting from the application of a small refinement of a previously used calculational model or design method.

Both of the proposed changes are similar to example (vi) of 48 FR 14870. Therefore it is proposed that these changes do not involve significant hazards considerations. A description of each of the proposed changes and how each is similar to example (vi) of 48 FR 14870 follows:

1. Proposed Change PCN-85, RTD Response Time

The proposed change would revise Technical Specification (T.S.) 3/4.3.1, "Reactor Protective Instrumentation System "(RPIS). Specification 3/4.3.1 requires that the RPIS be operable and defines the number and type of RPIS

channels required, setpoints, response times, and periodic testing required to assure operability. Table 3.3-2, "Reactor Protective Instrumentation Response Times," defines the maximum response times for the RPIS in order to verify that the maximum RPIS response times assumed in the safety analysis are not exceeded and that the RPIS will respond to transients and accidents as analyzed. Specifically, for the low departure from nucleate boiling ratio (DNBR) trip function, Table 3.3-2 specifies a maximum response time of 0.68 seconds for RCS hot and cold leg temperature measurements. The table notes that these response times are based on an RTD response time of six seconds. The proposed change would revise this note to allow RTD response times to be increased to a maximum of 13 seconds provided that RTD response times of greater than six seconds are compensated for with penalty factors applied to DNBR calculations made for the affected channel. The penalty factors would be implemented by adjustments to core protection calculator and core operating limit supervisory system addressable constants. The required addressable constant adjustments would be defined in two new tables to be included in the technical specifications by the proposed change.

The proposed change is similar to example (vi) of 48 FR 14870 in that increasing the allowed RTD response times may reduce a safety margin, but

the results of the change are clearly within all acceptance criteria specified in the SRP. Specifically, SRP Section 7.2, "Reactor Trip System" requires that the reactor trip system automatically actuate a trip of the reactivity control systems to assure that the specified acceptable fuel design limits are not exceeded. The proposed change would allow increased RTD response times, but would require that such increases be compensated for by applying penalty factors to the calculation of DNBR and local power density (LPD). The use of these penalty factors will assure that in spite of increased RTD response times, the RPIS will continue to automatically initiate a reactor trip in sufficient time to ensure that acceptable fuel design limits are not exceeded. Therefore the RPIS will continue to meet the SRP acceptance criteria and the proposed change is similar to example (vi) of 48 FR 14870. On this basis, the NRC staff proposes to determine that this change does not involve a significant hazards consideration.

2. Proposed Change PCN-142, Electrical Power Sources

The proposed would change revise Technical Specification 3/4.8.1.1, "Electrical Power Systems - AC Source - Operating", which defines the onsite and offsite power sources required to be available when the plant is operating in Modes 1-4. Specification 3.8.1.1 requires operability of two physically

independent circuits between the offsite transmission network and the onsite Class 1E distribution system when the plant is in Modes 1-4. At San Onofre Units 2 and 3 the second source of offsite power is provided through the opposite unit's distribution system. Thus, for Unit 2, one of the two required sources of offsite power is supplied from Unit 2 itself through the Unit 2 reserve auxiliary transformers. The second source of offsite power for Unit 2 is provided through the Unit 3 reserve auxiliary transformers. Unit 3 meets the requirements for the independent offsite power sources in an analogous manner.

The proposed change would revise the surveillance requirement of T.S. 4.8.1.1 and bases Section 3/4.3.8.1 to allow substitution of the unit auxiliary transformer for the reserve auxiliary transformers as a specific unit's source of offsite power, provided that the main generator disconnect links are removed, i.e. the unit is offline. Thus with the proposed change, for Unit 2, one of the two required sources of offsite power would be supplied from Unit 2 itself through either the Unit 2 reserve auxiliary transformers or the Unit 2 unit auxiliary transformer, provided that the Unit 2 main generator disconnect links are removed. The second source of offsite power would be provided through either the Unit 3 reserve auxiliary transformers or the Unit 3 unit auxiliary transformer provided that the Unit 3 main generator disconnect links are removed. An analogous situation would exist for Unit 3 with the proposed change. This change would result in additional flexibility in meeting the offsite power requirements when one or both units are offline.

The proposed change is similar to example (vi) in that the increased flexibility in meeting offsite power source requirements may in some way reduce a safety margin, but where the result of the change meet all applicable acceptance criteria specified in the SRP. Specifically, SRP Section 8.2, "Offsite Power System" requires two separate circuits from the offsite transmission network to the onsite Class 1E power distribution system, adequate physical and electrical separation, and system capacity and capability to supply power to all safety-related loads and other required equipment. The proposed change would allow use of an alternate installed path in providing the required circuits from the offsite transmission network to the onsite Class 1E distribution system. Physical and electrical separation and system capacity would be maintained. Therefore, the proposed change satisfies the SRP acceptance criteria and is similar to example (vi) of 48 FR 14870. On this basis, the NRC staff proposes to determine that this change does not involve a significant hazards consideration.

The Commission is seeking public comments on this proposed determination. Any comments received within 30 days after the date of publication of this notice will be considered in making any final determination. The Commission will not normally make a final determination unless it receives a request for a hearing.

Comments should be addressed to the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attn: Docketing and Service Branch.

By January 31, 1985, 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 petition for leave to intervene. Request 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 prehearing 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 prehearing conference scheduled in the proceeding, a petitioner shall file a supplement to the 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 amendment 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.

If a hearing is requested, the Commission will make final determination on the issue of no significant hazards consideration. The final determination will serve to decide when the hearing is held.

If the final determination is that the amendment requests involves no significant hazards consideration, the Commission may issue the amendments and make them effective, notwithstanding the request for a hearing. Any hearing held would take place after issuance of the amendments.

Normally, the Commission will not issue the amendments until the expiration of the 30-day notice period. However, should circumstances change during the notice period such that failure to act in a timely way would result, for example, in derating or shutdown of the facility, the Commission may issue the license amendments before the expiration of the 30-day notice period, provided that its final determination is that the amendments involve no significant hazards consideration. The final determination will consider all public and State comments received. Should the Commission take this action, it will publish a notice of issuance and provide for opportunity for a hearing after issuance. The Commission expects that the need to take this action will occur very infrequently.

A request for a hearing or a petition for leave to intervene must be filed with the Secretary of 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, 1717 H Street, N.W. Washington, D.C., by the above date. Where petitions are filed during the last ten (10) days of the notice period, it is requested that the petitioner promptly so inform the Commission by a toll-free telephone call to Western Union at (800) 325-6000 (in Missouri (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 Executive Legal Director, 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 & Sutcliffe, Attn: David R. Pigott, Esq., 600 Montgomery Street, San Francisco, California 94111.

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 Atomic Safety and Licensing Board designated to rule on the petition and/or request, that the petitioner has made a substantial showing of good cause for the granting of a late petition and/or request. That determination will be based upon a balancing of the factors specified in 10 CFR 2.714(a)(1)(i)-(v) and 2.714(d).

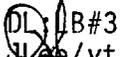
For further details with respect to this action, see the applications for amendments which are available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C., and at the San Clemente Library, 242 Avenida Del Mar, San Clemente, California 92672.

Dated at Bethesda, Maryland, this 21st day of December, 1984.

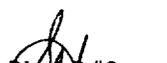
FOR THE NUCLEAR REGULATORY COMMISSION

*Original signed by:
George W. Knighton*

George W. Knighton, Chief
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