

December 4, 1989

Docket No. 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 & Electric Company
101 Ash Street
P.O. Box 1831
San Diego, California 92112

Gentlemen:

SUBJECT: ISSUANCE OF AMENDMENT NO. 69 TO FACILITY OPERATING LICENSE NO.
NPF-15 SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 3
(TAC NO. 74109)

The Commission has issued the enclosed amendment to Facility Operating License No. NPF-15 for San Onofre Nuclear Generating Station, Unit 3. The amendment consists of changes to the Technical Specifications in response to your application dated July 26, 1989 (PCN 294).

The amendment revises Technical Specification 3/4.7.6, "Snubbers," to permit a one-time extension of the inspection period from 12 months ($\pm 25\%$) to 20 months ($\pm 25\%$) for certain inaccessible snubbers in the containment.

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.

Sincerely,

original signed by

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

Enclosures:

1. Amendment No. 69 to License No. NPF-15
2. Safety Evaluation

cc w/enclosures:
See next page

DRSP/PD5 JLee 11/14/89	DRSP/PD5 LKokajko:tg 11/14/89	OGC PAJ 11/22/89	DRSP/PD5 GKnighton 12/04/89
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[SO 2/3 AMEND 74109]

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AMENDMENT NO. 69 TO FACILITY OPERATING LICENSE NO. NPF-15

Docket File

NRC & LPDRs

PD5 Plant File

J. Zwolinski (13H24)

J. Lee

L. Kokajko

OGC

D. Hagan (MNBB 3302)

E. Jordan (MNBB 3302)

T. Meek (8) (P1-137)

W. Jones (P-130A)

J. Calvo (11F23)

ACRS (10)

GPA/PA

ARM/LFMB

Region V (4)

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

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Lawrence E. Kokajko, Project Manager
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IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 69 to License No. NPF-15
2. Safety Evaluation

cc w/enclosures:

See next page

Mr. Harold B. Ray
Southern California Edison Company

San Onofre Nuclear Generating
Station, Units 2 and 3

cc:

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

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

Orrick, Herrington & Sutcliffe
ATTN: David R. Pigott, Esq.
600 Montgomery Street
San Francisco, California 94111

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

Alan R. Watts, Esq.
Rourke & Woodruff
701 S. Parker St. No. 7000
Orange, California 92668-4702

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

Mr. Sherwin Harris
Resource Project Manager
Public Utilities Department
City of Riverside
3900 Main Street
Riverside, California 92522

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

Mr. Charles B. Brinkman
Combustion Engineering, Inc.
12300 Twinbrook Parkway, Suite 330
Rockville, Maryland 20852

Mayor, City of San Clemente
San Clemente, California 92672

Mr. Phil Johnson
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

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

Mr. Don Womeldorf
Chief Environmental Management Branch
California Department of Health
714 P Street, Room 616
Sacramento, California 95814

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



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. 69
License No. NPF-15

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the license for San Onofre Nuclear Generating Station, Unit 3 (the facility) filed by Southern California Edison Company (SCE) on behalf of itself and San Diego Gas and Electric Company, the City of Riverside, California and the City of Anaheim, California (licensees) dated July 26, 1989 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 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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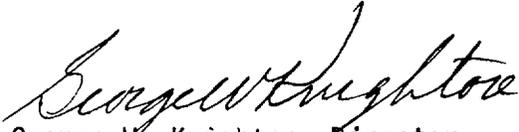
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-15 is hereby amended to read as follows:

(2) Technical Specification

The Technical Specifications contained in Appendix A, and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 69, are hereby incorporated in the license. SCE 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



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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: December 4, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 69

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 contain marginal lines indicating the area of change. Also enclosed is the following overleaf page to the amended page.

AMENDMENT PAGE

3/4 7-17

OVERLEAF PAGE

3/4 7-18

PLANT SYSTEMS

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

The first inservice visual inspection of snubbers shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers. If less than two snubbers are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months \pm 25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

<u>No. Inoperable Snubbers per Inspection Period</u>	<u>Subsequent Visual Inspection Period*##</u>
0	18 months \pm 25%##
1	12 months \pm 25%##
2	6 months \pm 25%
3,4	124 days \pm 25%
5,6,7	62 days \pm 25%
8 or more	31 days \pm 25%

*The inspection interval shall not be lengthened more than one step at a time.

#The provisions of Specification 4.0.2 are not applicable.

##20 months \pm 25% for inspections conducted during the Cycle 4 refueling outage.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

c. Visual Inspection Acceptance Criteria

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 may be determined 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 connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

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:

1. 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.

*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.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 69 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, UNIT 3

DOCKET NO. 50-362

1.0 INTRODUCTION

By letter dated July 26, 1989, Southern California Edison Company (the licensee) requested a change to the Technical Specifications for Facility Operating License No. NPF-15 that authorizes operation of the San Onofre Nuclear Generating Station, Unit 3 in San Diego County, California.

The licensee requested a revision to Technical Specification 3/4.7.6, "Snubbers," to permit a one-time increase in the visual inspection interval for certain inaccessible snubbers from 12 months \pm 25% to 20 months \pm 25% to support nominal 24 month fuel cycle (Cycle 4) operation.

The licensee is seeking this one-time extension since San Onofre Unit 3 cannot complete the current extended fuel cycle (Cycle 4) of operation (nominal 24 months) without exceeding the Technical Specification allowable visual inspection period. Performance of these inaccessible snubber inspections would require unit shutdown due to their location in high radiation zones and the need to erect ladders or scaffolding for inspection.

2.0 DISCUSSION AND EVALUATION

In 1987, San Onofre Unit 3 changed the duration of its refueling cycle from approximately 15 months to a nominal 24 months. This inspection period has been reduced from 18 months to 12 months (\pm 25%) because one inaccessible snubber was found to be inoperable during the previous inspection in June 1988. The licensees' Nonconformance Report (NCR) 3-2065, issued July 7, 1988, documented that snubber S3-S1-045-A-016-T (PSG-35) was found frozen. The root cause was determined to be vibration induced damage.

The performance of the current Technical Specification visual inspections of remaining inaccessible mechanical snubbers would require unit shutdown

because many of the snubber inspections require the use of ladders or scaffolding; and these snubbers are in high radiation areas where inspection during operation would result in unnecessarily high personnel radiation exposures, thus compromising ALARA program objectives. The purpose of this proposed one-time Technical Specification change is to allow Unit 3 to complete its current 24 month refueling cycle (Cycle 4) without having to shutdown to satisfy the required 12 month visual inspection. The licensee requests that the 12 month inspection period be waived, and that the requirement be changed to 20 months \pm 25%. Since San Onofre Unit 3 is scheduled to be shutdown for refueling on March 15, 1990, this one-time change will allow the licensee to perform the required visual inspections during the refueling outage when the potential for personnel hazards is less.

In an effort to eliminate the need to request this one-time extension of the snubber visual inspection period, the licensee attempted to perform a complete visual inspection of the 471 inaccessible snubbers during the recent Unit 3 mini-outage which ended in early April. Due to the short duration of this outage, the licensee was unable to inspect 99 of these snubbers in the most difficult to reach locations (requiring ladders, scaffolding or special dosimetry packages). However, snubber S3-S1-045-A-016-T and three other snubbers (judged to be similar in terms of local environmental conditions and function) were successfully inspected during this outage.

None of the 372 inspected snubbers were found to be inoperable, and no evidence of conditions resembling those which caused the single snubber to fail in June 1988 was found.

Statistical analysis, requiring the maintenance of at least a 95 percent confidence level that at least 90 percent of the snubber group remains operable, was performed by another utility for a snubber group equal to or greater than 200. The result of this analysis demonstrated that for zero, one or two inoperable snubbers from the previous inspection, the group confidence level and reliability level were in fact substantially greater than 95 percent and 90 percent, respectively, for a "next inspection period" of 18 months \pm 25%. This is a very conservative result for total snubber populations much greater than 200. San Onofre has a snubber population greater than 800 in each unit.

San Onofre Unit Nos. 2 and 3 have a very successful snubber program. Since 1983, a total of 11,570 snubbers in both units were inspected. There have been only 9 visual failures in this time period. This equates to a visual inspection failure rate of 0.078%.

The April 1989 inspection of 372 out of 471 inaccessible snubbers (almost 80%) in Unit 3 revealed no inoperable snubbers. Inspection of the most recently inoperable snubber showed no repetition of the June 1988 conditions. In addition, during the recent (July 1989) outage to repair a leaking Unit 3 low pressure safety injection pump seal, 21 of the remaining 99 mechanical snubbers and all 8 of the hydraulic snubbers were visually inspected with no non-conformances noted.

The proposed Technical Specification change will allow Unit 3 to complete its current scheduled operating cycle (Cycle 4) without being required to shutdown to perform snubber visual inspections. This lowers the probability of unusual events which are more likely to occur during transient operation (heatup and cooldown) than at full power steady state operation. Increasing the visual inspection interval eliminates a shutdown, and therefore one cooldown/heatup cycle for Unit 3 that would otherwise be required before the unit is shutdown for refueling in March of 1990. Statistical analyses of snubber failure at other plant sites for large snubber populations show that a similar inspection interval increase has no significant detrimental effect on the confidence level or reliability level of snubber operability.

Performing the visual inspections during the refueling outage is most advantageous from an ALARA standpoint, because inaccessible area radiation dose will be substantially lower, and the outage duration is such that detailed radiation protection planning can be applied to the inspection program. The NRC staff is currently developing generic guidelines which would allow utilities to visually inspect snubbers at their scheduled outages. This proposal satisfies the requirements of those guidelines.

During a telephone conversation with the licensee on November 6, 1989, it was determined that the proposed change was "wordy" and reflected an incorrect date for the next refueling outage for San Onofre Unit 3. As a result of a review of Amendment 64, the licensee agreed to a modification such that the proposed change would reflect the wording that Amendment 64 entailed for snubber inspection. In the corrected version, the Technical Specifications will state, "##20 months \pm 25% for inspections conducted during the Cycle 4 refueling outage."

The proposed change by the licensee has been reviewed by the staff and was found to be acceptable because it will eliminate unnecessary testing of snubbers resulting in reduced man-rem exposure without undermining the effectiveness of the overall surveillance program. Therefore, based upon the above information, the staff approves the amendment for the one-time extension to the snubber visual inspection period.

3.0 CONTACT WITH STATE OFFICIAL

The NRC staff has advised the State Department of Health Services, State of California, of the proposed determination of no significant hazards consideration. No comments were received.

4.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an environmental assessment and finding of no significant impact have been prepared and published (54 FR 48702) in the Federal Register on November 24, 1989. Accordingly, based upon the environmental assessment, the Commission has determined that the issuance of this amendment will not have a significant effect on the quality of the human environment.

5.0 CONCLUSION

We have 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 Contributors: Jai R. N. Rajan
Lawrence E. Kokajko

Dated: December 4, 1989

UNITED STATES NUCLEAR REGULATORY COMMISSIONSOUTHERN CALIFORNIA EDISON COMPANY, ET AL.DOCKET NO. 50-362FACILITY OPERATING LICENSES

The U.S. Nuclear Regulatory Commission (Commission) has issued Amendment No. 69 to Facility Operating License No. 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), which revised the Technical Specifications for operation of the San Onofre Nuclear Generating Station, Unit No. 3, located in San Diego County California.

The amendment was effective as of the date of issuance. This amendment revises Technical Specification 3/4.7.6, "Snubbers," to permit a one-time extension of the inspection period from 12 months ($\pm 25\%$) to 20 months ($\pm 25\%$) for certain inaccessible snubbers in the containment. This amendment is in response to an application for amendment designated as PCN 294.

The application for amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations. The Commission has made appropriate findings as required by the Act and the Commission's regulations in 10 CFR Chapter I, which is set forth in the license amendment.

Notice of Consideration of Issuance of Amendment and Opportunity for Hearing in connection with this action was published in the FEDERAL REGISTER on September 7, 1989 (54 FR 37171). No request for a hearing or petition for leave to intervene was filed following this notice.

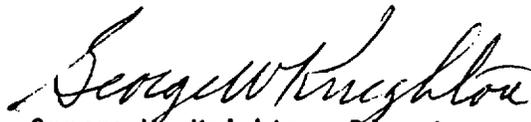
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The Commission has prepared an Environmental Assessment related to the action and has determined that an environmental impact statement will not be prepared and that issuance of the amendment will have no significant adverse effect on the quality of the human environment.

For further details with respect to the action see (1) the application for amendment dated July 26, 1989 (2) Amendment No. 69 to License No. NPF-15, (3) the Commission's related Safety Evaluation and (4) the Commission's Environmental Assessment. All of these items are available for public inspection at the Commission's Public Document Room, 2120 L Street NW., Washington, DC 20555, and the General Library, University of California, P. O. Box 19557, Irvine, California 92713. A copy of items (2), (3) and (4) may be obtained upon request addressed to the U.S. Nuclear Regulatory Commission, Washington, DC 20555, Attention: Director, Division of Reactor Projects III, IV, V and Special Projects.

Dated at Rockville, Maryland this 4th day of December, 1989.

FOR THE NUCLEAR REGULATORY COMMISSION



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