

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON )  
COMPANY, ET AL. for a Class 103 License to ) DOCKET NO. 50-361  
Acquire, Possess, and Use a Utilization )  
Facility as Part of Unit No. 2 of the San ) Amendment Application  
Onofre Nuclear Generating Station ) No. 40

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90,  
hereby submit Amendment Application No. 40.

This amendment application consists of Proposed Change NPF-10-245  
to Facility Operating License No. NPF-10. Proposed Change NPF-10-245 is a  
request to revise Technical Specification 3/4.3.2, "Engineered Safety Feature  
Actuation System Instrumentation" and Technical Specification 3/4.3.3.1,  
"Radiation Monitoring Instrumentation." Proposed Change NPF-10-245 would  
remove requirements relating to the iodine /particulate channels of the Fuel  
Handling Isolation System (FHIS) airborne radiation monitors from technical  
specifications.

Pursuant to 10 CFR 170.12, the required amendment application fee of  
\$150 is enclosed.

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PDR ADOCK 05000361  
P PNU

Subscribed on this 1st day of September, 1988.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: *Denneth P. Bush*

Subscribed and sworn to before me this  
1st day of September, 1988.

*Lorna S. Langley*  
Notary Public in and for the County of  
Los Angeles, State of California



My Commission Expires: 8-30-89

Charles R. Kocher  
James A. Beoletto  
Attorneys for Southern  
California Edison Company

By: *James A. Beoletto*

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NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON )  
COMPANY, ET AL. for a Class 103 License to ) DOCKET NO. 50-362  
Acquire, Possess, and Use a Utilization )  
Facility as Part of Unit No. 3 of the San ) Amendment Application  
Onofre Nuclear Generating Station ) No. 26

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90,  
hereby submit Amendment Application No. 26.

This amendment application consists of Proposed Change NPF-15-245  
to Facility Operating License No. NPF-15. Proposed Change NPF-15-245 is a  
request to revise Technical Specification 3/4.3.2, "Engineered Safety Feature  
Actuation System Instrumentation" and Technical Specification 3/4.3.3.1,  
"Radiation Monitoring Instrumentation." Proposed Change NPF-15-245 would  
remove requirements relating to the iodine /particulate channels of the Fuel  
Handling Isolation System (FHIS) airborne radiation monitors from technical  
specifications.

Pursuant to 10 CFR 170.12, the required amendment application fee of  
\$150 is enclosed.

Subscribed on this 1st day of September, 1988.

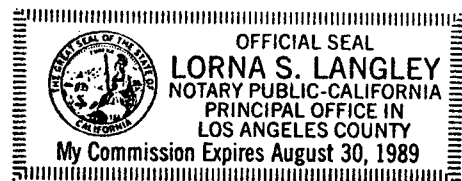
Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Wmuth P. Bush

Subscribed and sworn to before me this  
1st day of September, 1988.

Lorna S. Langley  
Notary Public in and for the County of  
Los Angeles, State of California



My Commission Expires: 8-30-89

Charles R. Kocher  
James A. Beoletto  
Attorneys for Southern  
California Edison Company

By: James A. Beoletto

## DESCRIPTION OF PROPOSED CHANGE NPF-10/15-245 AND SAFETY ANALYSIS

This is a request to revise Technical Specification 3/4.3.2, "Engineered Safety Feature Actuation System Instrumentation" and Technical Specification 3/4.3.3.1, "Radiation Monitoring Instrumentation."

### Existing Specifications

Unit 2: See Attachment "A"

Unit 3: See Attachment "C"

### Proposed Specifications

Unit 2: See Attachment "B"

Unit 3: See Attachment "D"

### Description

The proposed change revises Technical Specification (TS) 3/4.3.2, "Engineered Safety Feature Actuation System Instrumentation" (ESFAS) and TS 3/4.3.3.1, "Radiation Monitoring Instrumentation," to remove requirements relating to the iodine /particulate channels of the Fuel Handling Isolation System (FHIS) airborne radiation monitors. In general, these technical specifications define the number of channels and type of instrumentation required to be operable, response times, setpoints, periodic surveillance tests to verify operability, and actions to be taken when the minimum requirements are not met.

Specifically, TS 3/4.3.3.2 and 3/4.3.3.1 require that at least one of the two FHIS airborne radiation monitors with both a gaseous (noble gas) and an iodine/particulate monitoring channel be operable whenever spent fuel is stored in the spent fuel pool. The purpose of the FHIS airborne radiation monitors is to detect an abnormal increase in airborne radioactivity and initiate fuel handling building isolation and operation of the fuel handling building post accident cleanup filter system, which together mitigate the consequences of a postulated fuel handling accident. In the event that no FHIS airborne radiation monitors are operable, all operations involving movement of fuel in the storage pool or operation of the fuel handling machine over the storage pool are prohibited until at least one train of the fuel handling post accident cleanup filter system is restored to operable status.

The FHIS airborne radiation monitor iodine/particulate channels are of a fixed media design. Airborne iodine/particulates accumulate in the fixed media. The iodine/particulate channels indicate integrated activity with respect to time rather than instantaneous changes. Original design calculations indicated that there would be minimal iodine/particulate activity in the spent fuel pool area. Thus, no accumulation would be expected on the fixed media and the presence of any activity would be abnormal. The technical

specification setpoint was based on two times the expected background for the area where the monitor is located and does not account for any iodine/particulate activity present. In actuality there is a normal level iodine/particulate activity in the fuel handling building which accumulates on fixed media and results in spurious FHIS actuations requiring a four hour report under 10 CFR 50.72. Because of this, the media must be changed frequently. Additionally, the monitor is maintenance intensive.

The proposed change would delete the operability requirements, setpoints, and surveillance requirements for the iodine/particulate channels of the FHIS airborne radiation monitors. This would allow the iodine/particulate channels to be removed or abandoned in place and would significantly reduce the number of reportable spurious FHIS actuations and expense associated with maintenance. The existing technical specifications requirements would be retained for the noble gas channels which would isolate the fuel handling building and initiate the fuel handling building post accident cleanup system in the event of a postulated fuel handling accident.

Standard Review Plan (SRP) Section 11.5, "Process and Effluent Radiological Monitoring Instrumentation and Sampling Systems," and SRP Appendix 11.5-A, "Design Guidance for Radiological Effluent Monitors Providing Signals for Initiating Termination of Flow or Other Modification of Effluent Stream Properties," provide the pertinent guidance relative to the type of monitoring required to initiate fuel handling building isolation and actuation of the fuel handling building post accident cleanup system. Specifically, SRP Section 11.5, Table 1, identifies that noble gases should be monitored and used to initiate the automatic control feature (e.g. FHIS, in this case). The proposed change will continue to require the fuel handling building airborne radiation monitor noble gas channels to be operable to initiate FHIS.

### Safety Analysis

The proposed changes discussed above shall be deemed to involve a significant hazards consideration if there is a positive finding in any one of the following areas:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change would eliminate the iodine/particulate channels from the FHIS airborne radiation monitors. These channels initiate fuel handling building isolation and operation of the fuel handling post accident cleanup filter system. Thus, the proposed change could conceivably affect the consequences of a postulated fuel handling accident. The conclusions of the analysis of the fuel handling accident are presented in FSAR Section 15.7 and are evaluated in Safety Evaluation Report Section 15.4.4. Both the analyses presented in the FSAR and the SER evaluation

assume an instantaneous release of iodine and fission gases into the spent fuel pool area. The offsite dose calculations assume isolation and initiation of the post accident cleanup filter system at the outset of the event. Since the noble gas setpoint is set as close to background as possible without spurious actuation, a postulated fuel handling accident will result in actuation on noble gas without the iodine/particulate channel. The use of noble gas detection alone to initiate the protective action is consistent with the requirements of SRP Section 11.5. While the proposed change results in a reduction in the diversity of parameters used to actuate post accident cleanup it results in an insignificant change in the consequences of the previously analyzed accident.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change does not add new equipment to the plant, but would delete equipment which solely performs the function of fuel handling building isolation and post accident cleanup system actuation. Since these functions continue to be performed by the noble gas channels, the proposed change does not radically alter the previously analyzed fuel handling accident. Since no new equipment is added the proposed change does not create new ways in which an accident can be initiated. Therefore the proposed change does not create the possibility of a new or different kind of accident.

3. Will operation of the facility in accordance with the proposed change involve a significant reduction in a margin of safety?

Response: No

The proposed change places a greater reliance on the noble gas channel for initiation of fuel handling building isolation and cleanup system actuation. However iodine/particulates would not be present post accident without noble gas. It is unlikely that the fuel handling building protective features would not be actuated in the event of a postulated fuel handling accident. Therefore the proposed change does not result in a significant reduction in a margin of safety.

#### Safety and Significant Hazards Determination

Based on the above Safety Analysis it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; and (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

PWS:ft:9501F