

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA	)	
EDISON COMPANY, <u>ET AL.</u> for a Class 103	)	Docket No. 50-361
License to Acquire, Possess, and Use	)	
a Utilization Facility as Part of	)	Amendment Application
Unit No. 2 of the San Onofre Nuclear	)	No. 73
Generating Station	)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 73.

This amendment application consists of Proposed Technical Specification Change No. NPF-10-281 to Facility Operating License No. NPF-10. Proposed Technical Specification Change No. NPF-10-281 is a request to revise Technical Specification 3/4.3.3.3, "Seismic Instrumentation." The proposed change would increase the 18 month surveillance intervals to "refueling interval" to support nominal 24 month fuel cycle operation.

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

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Application of SOUTHERN CALIFORNIA	)	
EDISON COMPANY, <u>ET AL.</u> for a Class 103	)	Docket No. 50-362
License to Acquire, Possess, and Use	)	
a Utilization Facility as Part of	)	Amendment Application
Unit No. 3 of the San Onofre Nuclear	)	No. 59
Generating Station	)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 59.

This amendment application consists of Proposed Technical Specification Change No. NPF-15-281 to Facility Operating License No. NPF-15. Proposed Technical Specification Change No. NPF-15-281 is a request to revise Technical Specification 3/4.3.3.3, "Seismic Instrumentation." The proposed change would increase the 18 month surveillance intervals to "refueling interval" to support nominal 24 month fuel cycle operation.

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

Subscribed on this 16<sup>th</sup> day of January, 1989.

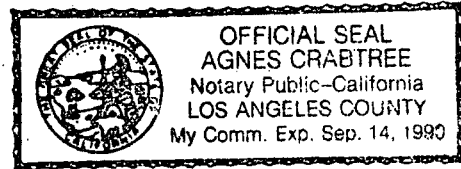
Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Winneth P. Bushni

Subscribed and sworn to before me this  
16<sup>th</sup> day of January 1989.

Agnes Crabtree  
Notary Public in and for the County of  
Los Angeles, State of California



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

By: James A. Beoletto

DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NPF-10/15-281

This is a request to revise Technical Specification 3/4.3.3.3, "Seismic 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 would revise Technical Specification (TS) 3/4.3.3.3, "Seismic Instrumentation." The operability of the seismic instrumentation ensures that sufficient capability is available to promptly determine the magnitude of a seismic event and evaluate the response of those features important to safety. This capability is required to permit comparison of the measured response to that used in the design basis for the facility to determine if plant shutdown is required pursuant to Appendix "A" of 10 CFR 100. Surveillance Requirement 4.3.3.3.1 requires performance of a channel calibration at least once every 18 months. The proposed change would revise the 18 month surveillance tests to "refueling interval," nominally 24 months.

A review of the history of the required 18 month surveillance tests, from the start of commercial operation to present, was performed. The review indicated one surveillance failed due to a bad regulator. The combination of the monthly channel check and the semiannual channel functional tests provide a high level of assurance that the system is capable of performing its design function.

Since the proposed change would increase the surveillance interval from 18 months to "refueling interval" for a nominal 24 month cycle, the actual time interval between surveillances will be a function of the plant capacity factor for that particular fuel cycle. The equilibrium fuel cycle length will be approximately 513 effective full power days (EFPD). Assuming a production factor of 90% and a 75 day refueling outage, the actual cycle length, and the surveillance interval, would be approximately 21 months. Currently, Specification 4.0.2 allows a 25% extension of surveillance intervals which would accommodate uninterrupted operation for the equilibrium cycle length, except that the Specification 4.0.2 limitation on the application of a 25% extension, such that three consecutive intervals do not exceed 3.25 times the nominal interval, eventually would impact operation. Thus, the proposed change does not represent a radical increase over what is already permitted by technical specifications.

Subscribed on this 16<sup>th</sup> day of January, 1989.

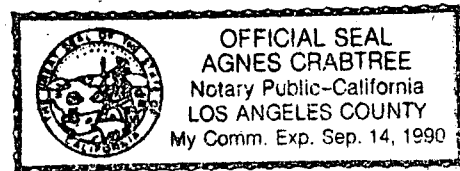
Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Kenneth P. Boudreau

Subscribed and sworn to before me this  
16<sup>th</sup> day of January 1989.

Agnes Crabtree  
Notary Public in and for the County of  
Los Angeles, State of California



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

By: James A. Beoletto

## 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 system functions to monitor motion of vital equipment during a seismic event. Information gathered by this instrumentation is used to make decisions regarding the acceptability of plant operation following these types of events. The proposed change increases the interval for surveillance testing currently performed at 18 month intervals. The combination of the monthly channel check and the semiannual channel functional tests provide a high level of assurance that the system is capable of performing its design function. Therefore, the proposed change will not involve a significant increase in the probability or consequences of any accident previously evaluated.

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 affects only the frequency of the Seismic Instrumentation surveillance. The proposed change does not alter the configuration of the facility or the manner in which it is operated. Therefore the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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 affects only the frequency of the surveillance test which may result in a small reduction in confidence in system operability and the associated margin of safety. The combination of the monthly channel check and the semiannual channel functional tests provide a high level of assurance that the system is capable of performing its design function. Therefore, the proposed change will not involve 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.