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SUBJECT: Forwards Amend Applications 78 & 64 to Licenses NPF-10 & NPF-15, consisting of proposed change PCN-287. *+ See Rept.*

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March 10, 1989

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Spent Fuel Pool Reracking
Amendment Application Nos. 78 and 64
San Onofre Nuclear Generating Station
Units 2 and 3

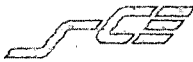
Reference: OT Position for Review and Acceptance of Spent Fuel Storage and Handling Applications (Enclosure 1 to April 14, 1978 letter from Brian K. Grimes (NRC) to All Power Reactor Licensees including revision issued as an enclosure to the January 18, 1979 letter from Brian K. Grimes (NRC) to All Power Reactor Licensees)

Enclosed are Amendment Application Nos. 78 and 64 to Facility Operating Licenses NPF-10 and NPF-15 for San Onofre Nuclear Generating Station, Units 2 and 3, respectively (Enclosure 1). These Amendment Applications consist of proposed change NPF-10/15-287 (PCN-287). PCN-287 is a request to revise Technical Specifications 3.9.7, "Heavy Loads Over Fuel Assemblies in the Fuel Storage Pool;" 5.6.1.b and 5.6.2, "Fuel Storage Criticality" and 5.6.4, "Fuel Storage Capacity." The purpose of the proposed Technical Specification changes is to provide for increasing the capacity of the fuel storage racks at both Unit 2 and Unit 3 from 800 to 1572 fuel assembly storage locations and for conducting specific heavy load lifts above the new storage racks that are needed for construction and normal fuel pool operations.

Additional spent fuel storage capacity is needed because a Federal repository will not be available as initially scheduled. With the present licensed capacity, Unit 2 and Unit 3 would each retain full-core reserve storage capacity through Cycle 6 beginning in 1991 and 1992, respectively. The proposed increase in storage will extend the full-core reserve storage capacity for each unit through Cycle 11 beginning in 2001 for Unit 2 and 2002 for Unit 3.

APD 1
1/8
Change: NRC Per 1 1/2 Non Prop
LPR 1 1/5 Enclosure

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PDR ADOCK 05000361
PDC



SCE is providing, in support of this amendment request, eight (8) copies of the "Spent Fuel Pool Reracking Licensing Report, San Onofre Nuclear Generating Station, Units 2 and 3," dated March 1989. This report (Attachment E to the enclosed Description and Safety Analysis) includes information identified in the above reference which is needed by the NRC staff to perform the review of proposed modifications of an operating reactor spent fuel storage pool. In order to identify additional information which could help SCE to provide a more complete amendment request which addresses all staff concerns, meetings were held with the NRC staff on June 3, 1988 to present proposed reracking plans and criteria and on December 7, 1988 to present preliminary analysis and design results. The NRC staff identified a number of items during these two meetings that would need to be addressed, and the responses to these items are provided in this Spent Fuel Pool Reracking Licensing Report.

Also provided in Enclosure 2 are four (4) copies of WNEP-8901, Rev. 1, the Westinghouse report "San Onofre Units 2 & 3 Fuel Rack Seismic Analysis Methods and Parameters" dated February 1989 (Proprietary) which is referenced in the "Spent Fuel Pool Reracking Licensing Report." Four (4) copies of WNEP-8901, Rev. 0, "San Onofre Units 2&3 Fuel Rack Seismic Analysis Methods and Parameters" (Non-Proprietary) dated February 1989, are also provided in Enclosure 2. As WNEP-8901 (Proprietary-Enclosure 2) contains information proprietary to Westinghouse Electric Corporation, it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.790 of the Commission's regulations. Accordingly, it is respectively requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.790 of the Commission's regulations. Correspondence with respect to the proprietary aspects of the Application for Withholding or the supporting Westinghouse Affidavit should reference CAW-89-029 and should be addressed to R. A. Wiesemann, Manager of Regulatory and Legislative Affairs, Westinghouse Electric Corporation, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

SCE will be requesting a meeting with the NRC Staff to be held in approximately two weeks to summarize the final analysis results and conclusions and responses to the NRC information requests identified in the June 3, 1988 and December 7, 1988 meetings discussed above. While this information is included in the enclosed Licensing Report, the purpose of the meeting will be to assist the NRC staff in focusing on areas of special interest and to expedite the review process. One of the areas of special interest relates to the free-standing spent fuel rack design analysis. SCE would like to obtain a preliminary assessment from the NRC staff regarding the acceptability of this design feature by April 21, 1989. As we discussed with you in our December 7, 1988 meeting, rack fabrication was scheduled to



commence March 15, 1989. However, SCE has delayed the start of rack fabrication until late April, 1989 in order to obtain input from the NRC prior to fabrication. Further, formal issuance of the license amendment is requested six (6) months from the date of this letter because final preparation for delivery of the new spent fuel racks and related construction activities which are based on approval of this license amendment request must begin as soon as possible to support rack delivery beginning in December 1989 and installation during the upcoming Cycle 5 Unit 2 operation.

This license amendment application addresses reracking with fuel in the spent fuel pool or "wet" reracking. Please note that removing all fuel from each pool and reracking "dry" is being evaluated. If dry reracking is determined to be feasible and reasonable, a revision to this application will be made requesting NRC approval of dry reracking.

The UFSAR fuel handling building spent fuel pool analysis was based on an abnormal thermal load from a pool water temperature of 200°F. The analysis methodology is being refined and the pool water temperature is increased from 200°F to 212°F plus adding 18°F to the wall for gamma heating. It is expected that the results will fall within the acceptable range shown in Table 4.6-2 of the "Spent Fuel Pool Reracking Licensing Report." The reanalysis is scheduled to take approximately six weeks, and the results will be provided to the NRC by May 15, 1989.

To facilitate rack installation, SCE is contemplating the removal of one east-west row of storage cells from Region II. If SCE decides to remove the row, a revision to this license amendment request will be submitted.

If you have any questions or would like additional information, please let me know.

Very truly yours,

A handwritten signature in cursive script, reading "Kenneth P. Bush".

Enclosures

cc: J. B. Martin, Regional Administrator, NRC Region V
F. R. Huey, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3
J. H. Hickman, California Department of Health Services

ENCLOSURE 2

- A. WNEP-8901, "San Onofre Units 2 and 3 Fuel Rack Seismic Analysis Methods and Parameters," Revision 1, February 1989 (Proprietary) (4 copies)
- B. WNEP-8901, "San Onofre Units 2 and 3 Fuel Rack Seismic Analysis Methods and Parameters," Revision 0, February 1989 (Non-Proprietary) (4 copies)
- C. February 10, 1989 letter from Robert A. Wiesemann (Westinghouse) to Thomas Murley (NRC) - Application for Withholding Proprietary Information from Public Disclosure and Accompanying Affidavit