

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. 80
Generating Station	)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 80.

This amendment application consists of Proposed Technical Specification Change No. NPF-10-291 to Facility Operating License No. NPF-10. Proposed Technical Specification Change No. NPF-10-291 is a request to revise Technical Specification 3/4.4.10, "Reactor Coolant Gas Vent System." The proposed change would increase the 18 month surveillance intervals to "refueling interval" to support nominal 24 month fuel cycle operation.

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P PDC

Subscribed on this 7<sup>th</sup> day of April, 1989.

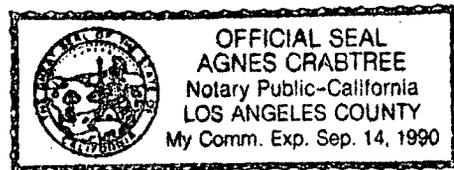
Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Winneth P. Bush

Subscribed and sworn to before me this  
7<sup>th</sup> day of April 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: Charles R. Kocher

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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. 65
Generating Station	)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 65.

This amendment application consists of Proposed Technical Specification Change No. NPF-15-291 to Facility Operating License No. NPF-15. Proposed Technical Specification Change No. NPF-15-291 is a request to revise Technical Specification 3/4.4.10, "Reactor Coolant Gas Vent System." The proposed change would increase the 18 month surveillance intervals to "refueling interval" to support nominal 24 month fuel cycle operation.

Subscribed on this 7<sup>th</sup> day of April, 1989.

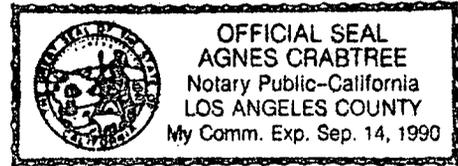
Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Walter P. Barber

Subscribed and sworn to before me this  
7<sup>th</sup> day of April 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: Charles R. Kocher

DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NPF-10/15-291

This is a request to revise Technical Specification 3/4.4.10, "Reactor Coolant Gas Vent System."

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 3/4.4.10, "Reactor Coolant Gas Vent System." This specification requires operability of the Reactor Coolant Gas Vent System in Modes 1, 2, 3 and 4 which ensures that noncondensable gases are exhausted from the primary system which could inhibit natural circulation core cooling following a design basis event. The design redundancy of the Reactor Coolant Gas Vent System serves to minimize the probability of inadvertent or irreversible actuation while ensuring that a single failure of a vent valve, or control system does not prevent isolation of the vent path. This specification also provides actions to be taken should the operability requirements not be met, and surveillance requirements to periodically demonstrate operability of the system.

The proposed change would specifically revise Surveillance Requirement (SR) 4.4.10. SR 4.4.10 requires that each reactor coolant system vent path be demonstrated operable at least once per 18 months. The proposed change would revise the frequency of this surveillance to "at least once per refueling interval." The proposed change is required since the current 18 month surveillance interval would necessitate a plant shutdown solely to perform portions of the surveillance. The portion of the surveillance which could be performed with the unit at power would result in high man-rem exposure. By SCE's letter dated March 20, 1989, the refueling interval frequency was defined in Table 1.2, "Frequency Notation," as "at least once per 24 months."

Specification 3/4.4.10 was recently added to the Technical Specifications and included the nominal refueling cycle surveillance interval of 18 months. There is no surveillance history for this specification. The change from the 18 month surveillance to "at least once per refueling interval" is also to achieve consistency with other technical specification changes proposed by SCE as part of its extended fuel cycle operations.

Since the proposed change would increase the surveillance interval from 18 months to a 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, should be approximately 21 months. Currently, Technical Specification 4.0.2 allows a 25% extension of surveillance intervals which would accommodate uninterrupted operation for the equilibrium cycle length, except that the Technical Specification 4.0.2 limitation on the application of the 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.

### 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 will revise the frequency of the current surveillance requirement from 18 months to "at least once per refueling interval." By SCE's letter dated March 20, 1989, Table 1.2, "Frequency Notation" defines refueling interval as at least once per 24 months. As discussed above, application of the 25% extension of surveillance intervals allowed by Specification 4.0.2 already permits a slight extension of surveillances. The proposed change would prevent a plant shutdown solely for the purpose of performing the surveillance. 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 does not modify the plant or modify operation of the facility. 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 only revises the frequency of the 18 month surveillance requirements. Operation of the facility remains unchanged by the proposed change. 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.

TJM:0782n

ATTACHMENT A  
EXISTING SPECIFICATION

## REACTOR COOLANT SYSTEM

### 3/4.4.10 REACTOR COOLANT GAS VENT SYSTEM

#### LIMITING CONDITION FOR OPERATION

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3.4.10 The Reactor Coolant Gas Vent System shall be OPERABLE with:

- a. At least one of valves 2HV0296A or 2HV0296B capable of being powered from an emergency bus and providing a vent path from the reactor vessel head; and,
- b. At least one of valves 2HV0297A or 2HV0297B capable of being powered from an emergency bus and providing a vent path from the pressurizer steam space; and,
- c. At least one of valves 2HV0298, capable of being powered from an emergency bus and providing a vent path to the containment atmosphere, or 2HV0299, capable of being powered from an emergency bus and providing a vent path to the quench tank; and
- d. Valves 2HV0296A, 2HV0296B, 2HV0297A, 2HV0297B, 2HV0299 and 2HV0298 all closed.

APPLICABILITY: MODES 1, 2, 3 and 4

#### ACTION:

- a. With any of valves 2HV0296A, 2HV0296B, 2HV0297A or 2HV0297B inoperable, operation may continue provided that:
  - i) power is removed from the inoperable valve(s) within 4 hours; and,
  - ii) valves 2HV0299 and 2HV0298 are maintained closed and power is removed within 4 hours; and,
  - iii) the inoperable valve(s) is restored to OPERABLE status during the next COLD SHUTDOWN.
- b. With any of valves 2HV0299 or 2HV0298 inoperable, operation may continue provided that:
  - i) power is removed from the inoperable valve(s) within 4 hours; and,
  - ii) valves 2HV0296A, 2HV0296B, 2HV0297A and 2HV0297B are all maintained closed and power is removed within 4 hours; and

## REACTOR COOLANT SYSTEM

### LIMITING CONDITION FOR OPERATION

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- iii) the inoperable valve(s) is restored to OPERABLE status during the next COLD SHUTDOWN.
- c. The provisions of 3.0.4 are not applicable for entry into MODES 3, 2 and 1.

### SURVEILLANCE REQUIREMENTS

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4.4.10 Each reactor coolant system vent path shall be demonstrated OPERABLE at least once per 18 months by:

1. Verifying all manual isolation valves in each vent path are locked in the open position.
2. Cycling each valve in the vent path through at least one complete cycle of full travel from the control room during COLD SHUTDOWN or REFUELING.
3. Verifying flow through the reactor coolant vent system vent paths during venting during COLD SHUTDOWN.