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SUBJECT: Forwards Amend Applications 85 & 70 to Licenses NPF-10 & NPF-15, respectively, consisting of PC NPF-10/15-295.

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July 31, 1989

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

Gentlemen:

Subject: Docket No. 50-361 and 50-362
Proposed Change NPF-10/15-295
San Onofre Nuclear Generating Station
Units 2 and 3

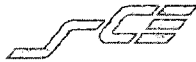
Enclosed are Amendment Application No. 85 to Facility Operating License NPF-10 and Amendment Application No. 70 to Facility Operating License NPF-15 for the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. The applications consist of Proposed Change NPF-10/15-295 (PCN-295), a request to revise Technical Specification 3/4.1.3.4, CEA Drop Time. This proposed change is similar in nature to Arkansas Power & Light's amendment request for the Arkansas Nuclear One Unit 2 facility already under review at NRC.

The proposed change introduces the use of an arithmetic average CEA drop time and the addition of Table 3.1-1 into Technical Specification 3/4.1.3.4. The revisions are necessary due to the increased CEA drop times measured using the new CEA Drop Time Test (CDTT) software methodology. Prior to the SONGS Unit 2 Cycle 4 start-up, CEA drop times were measured individually using a visicorder to monitor CEA position and interruption of power to the CEA's upper gripper coil. From the visicorder chart, the time from power interruption to 90% CEA insertion could be determined. Beginning with the SONGS Unit 2 Cycle 4 start-up, the CDTT software method has been employed. This method loads special computer software into one of the Control Element Assembly Calculators (CEACs). The software initiates a Core Protection Calculator (CPC) trip and simultaneously monitors the positions of all CEAs as a function of time. Under this method, power is interrupted at the reactor trip breakers rather than the individual breakers as in the visicorder method. Thus, the CDTT method more accurately reflects the operation of the reactor protection system during a scram.

However, the CEA drop times determined using the CDTT method have been found to be longer than those determined using the visicorder method. This is due to the fact that the circuit dissipating gripper coil stored energy has a longer decay time constant when tripped by the reactor trip breakers than by the individual circuit breakers. Due to this increased CEA drop time, SCE reanalyzed at that time all the design basis events to support a technical specification limit of 3.2 seconds. In addition, Core Operating Limits Supervisory System (COLSS) and CPC penalty factors were installed to account for the increased CEA drop time.

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July 31, 1989

Both SONGS Units 2 and 3 CEA drop time measurements using the CDTT method have little margin to the technical specification limit. Since failure to pass the CEA drop time test precludes entering Mode 2, and testing is performed on critical path during start-up, SCE would like to increase the margin between the technical specification limit and the measured values before the Cycle 5 start-up of Unit 2. The SONGS Unit 2 Cycle 5 refueling outage is scheduled to commence on September 8, 1989 and is scheduled to end on November 2, 1989.

SCE would greatly appreciate NRC review and approval of PCN-295 before the end of the Unit 2 refueling outage. SCE is prepared to provide all the necessary support to ensure the prompt review and approval of this amendment request.

If you have any question regarding this amendment request, please call me.

Respectfully submitted,

A handwritten signature in cursive script, reading 'Kenneth P. Paulini', is positioned below the 'Respectfully submitted,' text.

Enclosures

cc: J. B. Martin, Regional Administrator, NRC Region V
F. R. Huey, NRC Senior Resident Inspector, San Onofre Units 1, 2 & 3
D. E. Hickman, Project Directorate V, NRC Office of Reactor Regulation
J. H. Hickman, California Department of Health Services