

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. 87
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 87.

This amendment application consists of Proposed Technical Specification Change NPF-10-302 to Facility Operating License No. NPF-10. Proposed Technical Specification change No. NPF-10-302 is a request to revise Technical Specification Table 4.3-1, "Reactor Protective Instrumentation Surveillance Requirements." The proposed change will reduce the need for unnecessary adjustments to the Core Protection Calculators power indications when these power indications are conservative relative to the calorimetric power measurement.

Subscribed on this 2nd day of November, 1989.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: *Harold B. Bay*

Subscribed and sworn to before me this
2nd day of November, 1989.

Carol A. Gomez

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



Charles R. Kocher
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James A. Beoletto

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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. 72
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 72.

This amendment application consists of Proposed Technical Specification Change NPF-15-302 to Facility Operating License No. NPF-15. Proposed Technical Specification change No. NPF-15-302 is a request to revise Technical Specification Table 4.3-1, "Reactor Protective Instrumentation Surveillance Requirements." The proposed change will reduce the need for unnecessary adjustments to the Core Protection Calculators power indications when these power indications are conservative relative to the calorimetric power measurement.

Subscribed on this 2nd day of November, 1989.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

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DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-10/15-302

This is a request to revise Note (2) of Table 4.3-1, Reactor Protective Instrumentation Surveillance Requirements, to modify the requirements related to the calibration of the Core Protection Calculator (CPC) power indications to a calorimetric power measurement.

Existing Specifications

Attachment A
Attachment C

Proposed Specifications

Attachment B
Attachment D

Description

Note (2) of Table 4.3-1, "Reactor Protective Instrumentation Surveillance Requirements," requires adjustments to either the Linear Power Level or the CPC power indications anytime there is an absolute difference of 2.0% or greater with the calorimetric power calculation. Southern California Edison (SCE) proposes a revision to the surveillance requirement to require that the power indications be calibrated to the calorimetric power calculation if they are less than the calorimetric by more than 1.0% of RATED THERMAL POWER. The power indications would then be calibrated to be within -1.0% or greater than the calorimetric calculation. This revision is necessary in order to reduce unnecessary CPC addressable constants changes when the power indications are conservative relative to the calorimetric power calculation during low power operating conditions.

Discussion

The proposed change modifies the requirements for the CPC calibration to a calorimetric power measurement, typically the secondary calorimetric power measurement in the Core Operating Limits Supervisory System (COLSS). The current technical specification requires adjustment of the CPC delta-T power, the CPC nuclear power, and the linear power level indications to agree with the calorimetric power if the absolute difference is greater than 2%. The proposed change would require the power indications to be adjusted to within -1% or greater than the calorimetric if the indications are less than the calorimetric by more than 1% of RATED THERMAL POWER.

The current Note (2) of Table 4.3-1 has the potential for requiring unnecessary adjustments to the CPC addressable constants to perform calibrations when the power indications are conservative relative to the COLSS secondary calorimetric power measurement. It also has the potential for requiring calibration of a power indication by changing an addressable constant even when such a calibration could result in a reduction in the power indication.

If the power indications are higher than the secondary calorimetric power measurement, it is clearly more conservative to leave the power indications unchanged. Since the uncertainty in the secondary calorimetric power measurement is larger at low power than at high power, it is more conservative to maintain the linear power level and the CPC power calibration based on a high power calorimetric measurement, rather than to reduce the power indications based on a low power calorimetric measurement calibration.

The proposed change will remove the current requirement to calibrate the linear power level and the CPC power indications to a calorimetric measurement anytime they differ by more than 2.0%, and replace it with a requirement to re-calibrate to within -1.0% or greater than the calorimetric anytime the power indications are less than the calorimetric by more than 1.0% of RATED THERMAL POWER. It is necessary to preserve a small negative-side of the calibration window in order to permit calibration to as near to the calorimetric value as possible. The revision will reduce the need for unnecessary changes to CPC addressable constants and allow elimination of those that would result in a reduction in the power indications at low power.

The proposed change to the technical specification will provide greater assurance of conservative power indications during power increasing events following a calibration at low power. Combustion Engineering (C-E) has evaluated the potential for non-conservatism in the CPC response to power increasing transients following a calibration at low power which reduced the linear power level and the CPC power indications. C-E has concluded that the information at hand does not support the existence of a significant safety hazard since the potential for the CPC to be non-conservative when a CPC trip is required is very small. Therefore, the CPC and other Reactor Protective System trips, as well as control-grade functions, can be relied upon to terminate the increase in power prior to violation of fuel design limits. Additionally, CPC power calibration data for SONGS Units 2 and 3, Cycles 3 and 4, show no low power calibrations during the time period investigated other than for initial power ascension. During initial power ascension, the COLSS and CPC addressable constants are conservatively set to preserve their conservatism. The values of these addressable constants are only changed once the necessary startup physics tests have been successfully completed. Also, the actual secondary calorimetric power uncer-

tainty for SONGS Units 2 and 3 is smaller than that assumed in the CPC analysis further reducing the potential non-conservatism. Nonetheless, SCE wishes to eliminate this potential non-conservatism in the CPC as soon as possible.

Safety Analysis:

The proposed change described above shall be deemed to involve a significant hazards consideration if there is a positive finding in any 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 does not affect any physical plant system nor does it modify any previous analyses. The proposed change will reduce the need for unnecessary changes to CPC addressable constants, especially those that would result in a reduction in the power indications at low power levels. The change will also assure that the power indications remain conservative during a power increasing transient following a calibration at low power. Therefore, operation of the facility in accordance with this proposed change does not constitute an increase in the probability or consequences of an 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 involve any physical changes to any plant structures or systems. Therefore, the proposed change does 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 this proposed change involve a significant reduction in a margin of safety?

RESPONSE: No

The proposed technical specification change will provide a greater assurance that the power indications

following a calibration to the calorimetric power measurement at low power levels will remain conservative. Therefore, the proposed change does not involve any reduction in a margin of safety.

SAFETY AND SIGNIFICANT HAZARDS CONSIDERATION 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; (2) there is a 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.

ATTACHMENT A