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ACCESSION NBR: 8406290226 DOC. DATE: 84/06/27 NOTARIZED: YES DOCKET #
 FACIL: 50-361 San Onofre Nuclear Station, Unit 2, Southern Californ 05000361
 50-362 San Onofre Nuclear Station, Unit 3, Southern Californ 05000362
 AUTH. NAME: MEDFORD, M.O. AUTHOR AFFILIATION: Southern California Edison Co.
 RECIP. NAME: KNIGHTON, G.W. RECIPIENT AFFILIATION: Licensing Branch 3

SUBJECT: Application for amend to Licenses NPF-10 & NPF-15, changing Tech Specs re refueling machine & water level & clarifying acceptance criteria for fuel handling bldg post-accident cleanup filter sys.

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Southern California Edison Company



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June 27, 1984

M.O. MEDFORD

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Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

Enclosed for your review and approval are three proposed changes to the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 Technical Specifications. These proposed changes are required to clarify the applicability of Technical Specifications relating to the refueling machine (Proposed Change NPF-10/15-50) and refueling water level (Proposed Change NPF-10/15-179) and to clarify the acceptance criteria for a Fuel Handling Building Post-Accident Cleanup Filter System surveillance requirement (Proposed Change NPF-10/15-180).

Proposed Changes NPF-10/15-50 and NPF-10/15-179 resolve the question of what constitutes movement of a Control Element Assembly (CEA) in the determination of the applicability of Specification 3/4.9.6, Refueling Machine and 3/4.9.10 (Refueling) Water Level. Currently, the NRC staff and Region V interpret that the small CEA movements associated with the coupling/uncoupling of CEA extension shafts and verification of this coupling/uncoupling by weighing, constitute CEA movements within the applicability of these Specifications.

Proposed Change NPF-10/15-180 clarifies the surveillance requirement to verify the Fuel Handling Building Post-Accident Cleanup Filter System heater capacities. Specification 4.9.12.d.3 requires verification of the heater dissipation within a $\pm 5\%$ range of the specified capacity. The heater capacity specified corresponds to nominal voltage. Because the power dissipated by a heater varies with the square of the voltage, relatively small deviations from nominal voltage, which occur during normal plant operation, result in measured heater dissipations outside of the allowed range, thereby rendering the Fuel Handling Buildup Post Accident Cleanup Filter System inoperable. To be comparable with the Technical Specification acceptance criteria, the measured heater dissipation must be corrected to correspond to the nominal voltage dissipation. Although the existing Technical Specification wording does not preclude correction to nominal voltage conditions, an interpretation of the existing surveillance requirement to allow this has not been endorsed by the staff.

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Mr. G. W. Knighton

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Resolution of these three issues is required to support the SONGS Unit 2 refueling outage. Based on the current schedule, approval of these proposed changes will be required by approximately October 1, 1984. Therefore prompt consideration of these proposed changes is requested.

10 CFR 170.12 requires that an application fee of \$150.00 be included with each license amendment request. Each of the enclosed proposed changes is considered to constitute two license amendment requests, one for each of the San Onofre Nuclear Generating Station Units 2 and 3 Operating Licenses, NPF-10 and NPF-15, respectively. Therefore, in accordance with 10 CFR 170.12, enclosed is Southern California Edison Company's check for \$900.00, corresponding to the application fees for these six amendment requests. A formal amendment request will be made by August 1, 1984.

If you have any questions regarding the enclosed information, please call me.

Very truly yours,

FR Handy
for N. D. Medford

cc: Joseph O. Ward, California Department of Health Services
Harry Rood, NRC (to be opened by addressee only)
A. E. Chaffee, NRC Resident Inspector