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 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Application for amend to License NPF-10, revising Tech Specs  
 re ECCS subsystems to meet requirements of Branch Technical  
 Position RSB 5-1 to provide remote alignment capability  
 from control room, per SER, Section 5.4.3.

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*Southern California Edison Company*



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July 9, 1984

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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 is a proposed change to Technical Specification 3/4.5.2 "ECCS Subsystems - Tavg Greater Than or Equal to 350°F" of the San Onofre Nuclear Generating Station, Unit 2 Operating License NPF-10. Modification of the Unit 2 Shutdown Cooling System (SDCS) is required to meet the requirements of NRC Branch Technical Position RSB 5-1, to provide remote alignment capability from the control room as discussed in the Safety Evaluation Report, Section 5.4.3. The proposed change revises Surveillance Requirement 4.5.2.a in accordance with the modified SDCS design. Similar design and Technical Specification changes were implemented at Unit 3 prior to initial plant startup.

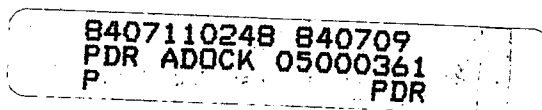
Approval of the proposed change is required by December 5, 1984 to support plant startup following the Unit 2 refueling outage. SCE will be available to assist the NRC staff in resolving comments regarding the proposed change.

In accordance with 10 CFR 170.12, an amendment application fee of \$150 is associated with the subject proposed change; a check for \$150 corresponding to the above is enclosed. A formal request for an amendment to Operating License NPF-10 will be submitted by August 1, 1984.

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

Very truly yours,

*M. O. Medford*



Enclosure

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

*Handwritten notes:*  
Hood  
w/ check  
\$150  
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DESCRIPTION OF PROPOSED CHANGE NPF-10-126  
AND SAFETY ANALYSIS

This is a request to revise Section 3/4.5.2 ECCS Subsystems - Tavg Greater Than or Equal to 350°F of the Technical Specifications for San Onofre Nuclear Generation Station Unit 2.

Description

The proposed change involves a revision to Surveillance Requirement 4.5.2.a, which specifies valve functions and positions required for Emergency Core Cooling System operability.

The proposed amendment would revise Technical Specification 3/4.5.2, ECCS Subsystems - Tavg Greater Than or Equal to 350°F. Section 3/4.5.2 requires Emergency Core Cooling System (ECCS) operability and specifies Surveillance Requirements to verify such operability. Surveillance Requirement 4.5.2.a specifies valve positions required for ECCS subsystem operability. The proposed change would revise Section 4.5.2.a to be consistent with modifications made to the Shutdown Cooling System (SDCS) in accordance with NRC Branch Technical Position RSB 5-1. The SDCS modifications will provide remote alignment capability from the control room. Previously manual valve pre-alignment was required prior to SDCS operation.

Specifically, the proposed change to Section 4.5.2.a includes the addition of two new SDCS bypass flow control valves (HV 8160, HV 8161) and Low Pressure Safety Injection (LPSI) Pump miniflow isolation valves (HV 8162 and HV 8163); replacement of the existing SDCS flow control valve (FV 0306 replaced by HV 0396); and deletion of the SDCS heat exchanger flow control valve and isolation valves (HV 9316, 14-78 and 14-80), SDCS bypass flow control/isolation valve 14-153 and isolation valves 14-81 and 14-82. The proposed change to Section 4.5.2.a will verify the correct valve alignment for ECCS subsystem operability following completion of the SDCS design modification.

The new SDCS bypass flow control valves (HV 8160 and HV 8161) provide for redundant, remotely operable, Class 1E bypass flow control. HV 0396 and HV 8161 are powered by the opposite train from HV 8160 consistent with single failure design criteria. In the event that power to HV 8160 (normally used for flow control) is lost, HV 8161 will be closed and HV 0396 used to provide the required bypass flow control. HV 0396, HV 8160 and HV 8161 replace FV 0306 and 14-153 to provide remote operation capability, consistent with BTP RSB 5-1. The existing non Class 1E-powered SDCS heat exchanger flow control valve and associated isolation valves (HV 9316, 14-78 and 14-80) are to be removed and the flow control function performed by new valves HV 8150 and HV 8151 (redundant, remotely operable and Class 1E powered).

Motor-operated LPSI miniflow isolation valves HV 8162 and HV 8163 are to be added to provide remote isolation capability consistent with BTP 5-1. Isolation of the miniflow lines is required to prevent transport of potentially contaminated primary coolant to the Refueling Water Storage Tank (RWST). The valves will be powered from the opposite train as the associated LPSI pump to prevent the loss of a train of emergency power from resulting in a potentially uncontrolled flow path from the Reactor Coolant System to the RWST.

Isolation valves 14-81 and 14-82 are to be removed from Section 4.5.2.a. The closure of 14-81 and 14-82 [isolation valves for HV 0396 (normally closed)] has been previously analyzed for this configuration in the FSAR failure modes and effects analysis of the Unit 3 Safety Injection System (FSAR Table 6.3-1 for Unit 3, Item 14). It was concluded that inadvertent closure of these valves would have no effect on ECCS operation, since HV 8160 (open) and HV 8161 (open) bypass 14-81 and 14-82 and provide the normal ECCS flowpath. In addition, surveillance of these valves requires frequent entry into a confined contaminated area (14-81 and 14-82 are not equipped with remote position indication) with associated personnel radiation exposure.

The SDCS design change (DCP 29N) has been reviewed and approved and does not involve an unresolved safety issue. A similar design change was implemented at Unit 3 prior to initial plant startup. This proposed change is required following completion of the SDCS modifications and prior to entry into Mode 3 during the Unit 2 refueling outage.

#### Existing Technical Specification

See Attachment A

#### Proposed Technical Specification

See Attachment B

#### Safety Analysis

The proposed change 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 involves an administrative revision of Section 4.5.2.a consistent with the modifications to the SDCS implemented through DCP 29N (in accordance with BTP RSB 5-1), as described above. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Will operation of the facility in accordance with the proposed change create the possibility of a new or different kind of accident from any previously evaluated?

Response: No

The proposed change and associated plant modifications (DCP 29N) are in accordance with BTP RSB 5-1 and do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Will operation of the facility in accordance with the proposed change involve a significant reduction in a margin of safety?

Reponse: No

DCP 29N has been reviewed and approved and the proposed modifications (described above) do not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (vii) relates to a change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations. San Onofre Nuclear Generating Station Unit 2 was originally designed to include manual operator action to reach cold shutdown conditions following a design basis accident, in keeping with the then existing criteria. However, with the advent of NRC Branch Technical Position (BTP) RSB 5-1, licensees were required to provide the capability to reach cold shutdown through operator action from the control room (as specified in Standard Review Plan Section 5.4.7). NUREG-0712 Section 5.4.3, requires that the design modifications to provide this capability be implemented prior to startup following the first refueling outage for San Onofre Unit 2. Therefore, the proposed change is similar to example (vii) in that it reflects compliance with a change in NRC regulations.

#### Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not involve a significant hazards consideration as defined by 10 CFR 50.92; (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.

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ATTACHMENT A