

ACCESSION: NRR 8510280449 DOC. DATE: 85/10/25 NOTARIZED: YES LOCKET: 7

FACIL: 50-361 San Onofre Nuclear Station, Unit 2, Southern California 05000361  
50-362 San Onofre Nuclear Station, Unit 3, Southern California 05000362AUTH. NAME: AUTHOR AFFILIATION  
MEDFORD, M.O. Southern California Edison Co.  
RECIP. NAME: RECIPIENT AFFILIATION  
KNIGHTON, G.W. Licensing Branch 3SUBJECT: Supplemental application for amend to License NPF-10 &  
NPF-15, withdrawing previously submitted Proposed Change  
Notice 84 & inserting encl rev.DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6  
TITLE: OR Submittal: General DistributionNOTES: ELD Chandler 1cy. 05000361  
OL: 02/16/82  
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October 25, 1985

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

Reference: Letter, Mr. K. P. Baskin (SCE) to Mr. H. R. Denton (NRC);  
Subject, "Docket Nos. 50-361 and 50-362, San Onofre Nuclear  
Generating Station Units 2 and 3;" dated January 25, 1984

By letter dated January 25, 1984, referenced above, Southern California Edison (SCE) submitted Amendment Application 23 for Facility Operating License NPF-10, San Onofre Unit 2, and Amendment Application 9 for Facility Operating License NPF-15, San Onofre Unit 3. Amendment Applications 23 and 9 were comprised in part by Proposed Change Number NPF-10-84 and Proposed Change Number NPF-15-84 (PCN-84), respectively. The purpose of PCN-84 was to revise License Condition 2.C(5), "Environmental Qualification," to reflect the current NRC requirement specified in 10 CFR 50.49, "Environmental qualification of electric equipment important to safety for nuclear power plants."

The purpose of this letter is to withdraw the previously submitted PCN-84 in its entirety and replace it with Enclosure 2 to this letter, which will delete License Condition 2.C(5). License Condition 2.C(5) was superseded on February 21, 1983 by 10 CFR 50.49. Included as Enclosure 1, is the original revision to License Condition 2.C(5), as proposed by the above reference. A revised description of the proposed change and a revised basis for no significant hazards consideration is also provided as Enclosure 2.

Should you have any questions or require further information, please do not hesitate to call me.

Very truly yours,

*M. O. Medford*

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Enclosure

cc: H. Rood (NRC Project Manager)  
F. R. Huey (NRC Senior Resident Inspector)

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Proposed Revision to License Condition 2.C(5)

PREVIOUSLY SUBMITTED BY LETTER DATED JANUARY 25, 1984

BEING REPLACED BY ENCLOSURE 2

As proposed by PCN-84, License Condition 2.C(5) would be revised to read as follows.

(5) Environmental Qualification (Section 3.11 SER, SSER #3, SSER #4)

- a. Prior to startup following the second refueling outage after March 31, 1982 or by March 31, 1985, whichever is earlier, the facility shall be in compliance with the provisions of 10 CFR Part 50, Section 50.49 for electrical equipment important to safety exposed to a harsh environment.
- b. Complete and auditable records shall be available and maintained which describe the environmental qualification status for all electrical equipment important to safety presently installed or stored for future use. Such records shall be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified to document complete compliance.
- c. SCE shall implement and keep in effect at all times environmental qualification maintenance procedures equivalent to those identified in the SCE letter of August 23, 1982, as modified by the NRC letter of August 30, 1982.
- d. Prior to startup following the second refueling outage after March 31, 1982 or by March 31, 1985, whichever is earlier, SCE shall provide affirmation of implementation of the improved surveillance and improved maintenance program procedures.

Proposed Revision to PCN-84

As requested by this letter, PCN-84 would be revised to read as follows:

(5) Environmental Qualification (Section 3.11 SER, SSER #3, SSER #4)

Deleted

Description (Revised)

The proposed change will delete License Condition 2.C(5), "Environmental Qualification." The purpose of License Condition 2.C(5) is to establish compliance with NRC environmental qualification guidelines as they pertain to electrical equipment exposed to a harsh environment in addition to maintaining complete and auditable records, maintenance procedures and surveillance procedures.

License Condition 2.C(5), part a, currently states that compliance with the provisions of NUREG-0588 "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," Revision 1, is required prior to startup following the first refueling outage. On February 21, 1983, NUREG-0588 was superseded by 10 CFR 50.49. The equipment qualified under the provisions of NUREG-0588, per 10 CFR 50.49(k), is not required to be requalified under the provisions of 10 CFR 50.49 as amended on November 19, 1984. Pursuant to the requirements of 10 CFR 50.49, the equipment qualification program must be in place by the end of the second refueling outage after March 31, 1982 or by March 31, 1985, whichever is earlier.

License Condition 2.C(5)b currently states that complete and auditable records which describe the environmental qualification status for all safety related electrical equipment be available and maintained in a central location. Under 10 CFR 50.49, the central location requirement was deleted, but records are required to be maintained in an auditable form for all installed electrical equipment important to safety. This requirement applies equally to that equipment which has been qualified and that which is awaiting qualification. SCE has fulfilled this requirement by making available complete and auditable records for Units 2 and 3 in environmental qualification files located both at the General Office and at San Onofre. In addition, procedures have been developed which will update and maintain these files as equipment is replaced, modified or otherwise altered.

License Condition 2.C(5)c requires implementation of an environmental qualification maintenance procedures program. SCE procedures which implement such a program have been developed and were identified in the SCE to NRC letter dated August 23, 1982 with corrections identified in the SCE to NRC letter of August 30, 1982.

Part d of License Condition 2.C(5) requires affirmation of implementation of an improved environmental qualification surveillance program to detect age related degradation and any improved maintenance program procedures required by such a surveillance program prior to startup following the first refueling outage. By letter dated April 10, 1985, M. O. Medford (SCE) to G. W. Knighton (NRC); Subject: "Docket Nos. 50-361 and 50-362 Implementation of Condition Monitoring Program, San Onofre Nuclear Generating Station, Units 2 and 3," SCE provided affirmation of its implementation of the improved surveillance program (condition monitoring) as required by License Condition 2.C(5)d for both Units 2 and 3. SCE is required to perform condition monitoring at refueling outage intervals beginning with the second refueling outage of Units 2 and 3. In most cases, this schedule is identical to the existing intervals based on Inservice Inspections (ISI), Technical Specification Surveillances or Preventative Maintenance Procedures. Data for the program is developed by utilizing both existing procedures for ISI, Technical Specification Surveillances and Preventative Maintenance Procedures. Environmental Qualification (EQ) Information Sheets and EQ Condition Monitoring Information Sheets are used in addition to improved corporate and station procedures to formally satisfy License Condition 2.C(5)d.

Condition Monitoring acceptance thresholds are designed to be identical to those already specified in the existing station procedures. SCE has many systems in place, mentioned above, which currently satisfy the requirements of such a program.

The proposed change will delete License Condition 2.C(5) since the final NRC EQ program requirements for all licensees are now specified in 10 CFR 50.49. Therefore deletion of License Condition 2.C(5) is within the acceptance criteria.

#### Safety Analysis (Revised)

The proposed change discussed above shall be deemed to involve a significant hazards consideration if positive findings are made 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 environmental qualification program as previously reviewed by the NRC Staff in the November 15, 1982 Safety Evaluation Report of Unit 3 has not changed in content or scope. Currently, the SONGS Unit 3 auxiliary feedwater (AFW) pump motor is the only piece of electrical equipment that is not qualified for a harsh environment. The addition of a forced lube oil cooling system to the AFW pump motors previously implemented at Unit 2, will be implemented at Unit 3 in order to qualify the motors. Implementation of this modification is scheduled for the first refueling outage. SCE will continue to visually inspect the steam line feeding the turbine-driven pump on a daily basis until the AFW pump motor is

qualified. Therefore, the operation of the facility in accordance with the proposed change will not increase 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 deletes License Condition 2.C(5) which has been superseded by 10 CFR 50.49. Presently, License Condition 2.C(5) does not clearly describe SCE's environmental qualification program for San Onofre Units 2 and 3. SCE's environmental qualification program is in full compliance with 10 CFR 50.49. Therefore, there is no new or different kind of accident from any accident previously evaluated that could occur.

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

Response: No

As stated above, the proposed change discussed above will not involve a significant reduction in a margin of safety. Therefore, operation of the facility in accordance with this proposed change will not involve a 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 (vi) relates to a change which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan (SRP). SRP Section 3.11, "Environmental Qualification of Mechanical and Electrical Equipment" describes the general requirements for environmental design and qualification of all equipment. The specific criteria for assessing the acceptability of the EQ program is provided in NUREG-0588, as referenced by the SRP, which has been superseded by 10 CFR 50.49. Hence, the acceptance criteria are specified in 10 CFR 50.49 "Environmental qualification of electric equipment important to safety for nuclear power plants." Since 10 CFR 50.49 is a federal regulation, SCE is required by law to be in compliance with the requirements of this section. Since the proposed change meets the above criteria, it is similar to example (vi) of 48 FR 14870.

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 Environmental Statement.

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