



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE
WALNUT CREEK, CALIFORNIA 94596-5368

MAY 18 1992

Docket No. 50-206

Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, California 92674-0128

Attention: Mr. R. W. Krieger,
Station Manager

Gentlemen:

Subject: Temporary Waiver of Compliance Regarding San Onofre Unit 1
Technical Specification 3.3.1

In your letter dated May 13, 1992 and in discussions with the NRC staff on May 18, 1992, you requested temporary relief from Technical Specification (TS) 3.3.1 to allow continued operation of Unit 1 while effecting repairs on the nitrogen side of the accumulator for the actuator for valve HV-852B. TS 3.3.1 requires that both trains of the safety injection system (SIS) be operable during power operations. The plant must be shutdown in accordance with TS 3.0.3 if this condition is not met. You requested a 24 hour waiver of compliance from TS 3.3.1 as it relates to valve HV-852B only, to allow repairs on the accumulator for HV-852B.

You have indicated that for the affected train of safety injection, isolation of the feedwater line is available by automatic closure of valves (feedwater regulating valve, associated bypass valve, and feedwater isolation valve) on a safety injection signal.

The following compensatory actions will also be in effect during the waiver period:

- 1) The unaffected train of the SIS will be maintained operable, including emergency power, and
- 2) Operators will be prepared to manually initiate valve closures downstream of HV-852B if a safety injection signal is received; an operator will be stationed at a downstream manual valve while this waiver is in effect.

You concluded that there were no significant hazards resulting from granting of the waiver request because one train of the SIS will be capable of performing its safety function during the waiver period and therefore the relatively brief inoperable time period of the other train would not significantly increase the plant risk.

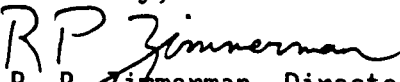
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Based on the above and discussions with the NRC Office of Nuclear Reactor Regulation, a temporary waiver of compliance for TS 3.3.1, related only to the requirement to enter TS 3.0.3 because the accumulator for HV-852B is inoperable, is granted for 24 hours. If other functionality problems are encountered with any other SIS components, all other applicable TS requirements apply.

This waiver begins at 8:00 a.m. on May 19, 1992; it expires when the accumulator is successfully repaired and compliance with TS 3.3.1 is restored, but no later than 8:00 a.m. on May 20, 1992. All other TS requirements remain in effect.

Sincerely,


R. P. Zimmerman, Director
Division of Reactor Safety
and Projects

cc: H. Ray, SCE
H. Morgan, SCE

bcc: J. Martin, RV
 T. Murley, NRR
 J. Taylor, EDO
 J. Sniezek, DEDO
 J. Lieberman, OE
 C. Casto, OEDO
 G. Kalman, NRR
 J. Partlow, NRR
~~J. Gagliardo, NRR~~ *DELETE*
 T. Quay, NRR *G. Helman, NRR*
 M. Fields, NRR
 M. Virgilio, NRR
 B. Boger, NRR
 Technical Assistant, DRP I/II, NRR

REGION V

<i>HTM</i> TSundsmo 5/18/92	<i>HTM</i> HWong 5/18/92	<i>SAR</i> SRichards 5/18/92	<i>KP</i> KPerkins 5/18/92	<i>RZ</i> R. Zimmerman 5/18/92
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for Virgilio
To Recon Center source
we had given to KP, also
TG assigned to K. Helman
5/18/92

NRR

MVirgilio
5/18/92

REQUEST COPY <input checked="" type="checkbox"/> YES / NO

SEND TO PDR <input checked="" type="checkbox"/> YES / NO

bcc: J. Martin, RV
 T. Murley, NRR
 J. Taylor, EDO
 J. Sniezek, DEDO
 J. Lieberman, OE
 C. Casto, OEDO
 G. Kalman, NRR
 J. Partlow, NRR
 G. Holahan, NRR
 T. Quay, NRR
 M. Fields, NRR
 M. Virgilio, NRR
 B. Boger, NRR
 Technical Assistant, DRP I/II, NRR

REGION V

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NRR

MVirgilio
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REQUEST COPY] YES / NO]

SEND TO PDR] YES / NO]

Mr. Harold B. Ray
Senior Vice President
Southern California Edison Company
Irvine, California 92718

Dear Mr. Ray:

SUBJECT: SAN ONOFRE UNIT 1 SIMULATOR EXEMPTION

In response to your letter dated November 2, 1990, the Commission has issued the enclosed exemption from certain requirements of 10 CFR 55.45 and 10 CFR 55.59 for the San Onofre Nuclear Generating Station Unit 1. The exemption authorizes extension of the submission deadline for Form NRC-474, Simulator Facility Certification, and authorizes a one-time extension of the annual requalification interval for operators.

Based on the considerations discussed in the exemption, we have concluded that the information provided and the actions described in the application form an acceptable basis for granting of an exemption. The Commission has determined, pursuant to 10 CFR 55.11, that this exemption is authorized by law and will not result in undue hazards to life or property and is otherwise in the public interest. Furthermore, the Commission has determined, pursuant to 10 CFR 50.12(a), that the special circumstances of 10 CFR 50.12(a)(2)(v) are applicable in that the exemption would provide only temporary relief from the regulation and you have made good faith efforts to comply with the regulation.

A copy of the exemption is being forwarded to the Office of the Federal Register for publication. The related Notice of Environmental Assessment and Finding of No Significant Impact was published in the Federal Register on March 22, 1991, (56 FR 12284). A copy is enclosed for your information.

Sincerely,

original signed by Charles M. Trammell
James E. Dyer, Director
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Exemption
- 2. Environmental Assessment

cc w/enclosures:
See next page

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GKalman	EJordan	JRowe
GHill (4)	ACRS (10)	

DOCUMENT NAME: S01 EXEMPTION

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NAME	: <i>DFoster</i>	: <i>GKalman</i>	: <i>RMGallo</i>	: <i>JDyer</i>	: <i>CGrimes</i>	
DATE	: <i>3/12/91</i>	: <i>3/12/91</i>	: <i>3/12/91</i>	: <i>3/13/91</i>	: <i>3/20/91</i>	: <i>3/20/91</i>
OFC	: D/DRPW	:	:	:	:	:
NAME	: <i>BBoger</i>	:	:	:	:	:
DATE	: <i>3/21/91</i>	:	:	:	:	:

CP3/uv

Mr. Harold B. Ray
Southern California Edison Company

San Onofre Nuclear Generating
Station, Unit No. 1

cc:

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Mr. Don J. Womeldorf
Chief, Environmental Management Branch
California Department of Health Services
714 P Street, Room 616
Sacramento, California 95814

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In: the Matter of)	
)	Docket No. 50-206
SOUTHERN CALIFORNIA EDISON COMPANY)	
SAN DIEGO GAS AND ELECTRIC COMPANY)	
(San Onofre Nuclear Generating Station)	
Unit No. 1))	

EXEMPTION

I.

Southern California Edison Company (SCE) and San Diego Gas and Electric (the licensees) are the holders of Provisional Operating License No. DPR-13 which authorizes the licensees to operate San Onofre Nuclear Generating Station, Unit No. 1 (SONGS 1), at power levels up to 1347 megawatts thermal (rated power). The license provides, among other things, that the San Onofre Station is subject to all rules, regulations, and Orders of the Commission now or hereafter in effect. The facility is a pressurized water reactor located on the licensees' site in San Diego County, California.

The revision to 10 CFR Part 55, "Operators' Licenses," which became effective on May 26, 1987, established requirements for the administration of operating tests on nuclear power plant simulators. These regulations, in conjunction with 10 CFR 50.54(i-1), require facility licensees to use simulation facilities when administering operating tests for initial licensing and requalification. These regulations further require that a certified or

NRC-approved simulation facility must be used to administer operating tests after May 26, 1991. Part 55.59(a)(2) requires each licensed operator to pass an annual operating test as part of the requalification requirements. By letter dated November 2, 1990, SCE requested an exemption from the schedular requirements for certification of a plant-referenced simulator and a one-time extension of the annual requalification operating test requirement.

II.

The licensee intends to comply with 10 CFR 55.45(b) by certifying a plant-referenced simulator. Section 55.45(b)(2)(iii) of 10 CFR Part 55 requires that facility licensees proposing to use a simulation facility consisting solely of a plant-referenced simulator submit Form NRC-474, "Simulation Facility Certification," no later than 46 months after the effective date of this rule, that is, by March 26, 1991. On November 2, 1990, SCE requested an exemption from this filing requirement to allow for the submittal of NRC Form-474 after March 26, 1991, but no later than February 5, 1992. Additionally, SCE requested an exemption from the requirements of 10 CFR 55.59(a)(2) to allow a one-time, 18-month interval between SONGS 1 requalification examinations in April 1991 and October 1992.

SCE initially planned to comply with 10 CFR 55.45(b) by submitting an application for Commission approval for the use of the Zion simulator. In accordance with 10 CFR 55.45(b)(2)(i) SCE submitted a plan by which this nonplant-referenced simulation facility would be developed and by which an application for its use would be submitted. The NRC reviewed this plan and,

in a letter dated January 3, 1989, indicated that the issue of physical and functional fidelity between SONGS 1 and the Zion simulator had not been adequately addressed. SCE subsequently concluded that it was not practical to modify the Zion simulator to meet the regulation and decided to procure a plant-referenced simulator. In March of 1990, SCE awarded a contract for the completion of a SONGS 1 simulator in 24 months.

Because the simulator would not be ready for certification by March 26, 1991, on March 23, 1990, SCE initially requested an exemption from 10 CFR 55.45(b)(2)(iii) to certify the SONGS 1 simulator no later than 60 days prior to conducting any operating tests after February 1993. They also requested an exemption from 10 CFR 55.45(b)(2)(iv) to allow them to continue to administer operating tests according to their existing program using the Zion simulator. This would have included initial licensing examinations in April and October of 1992 and annual requalification operating tests in October of 1991 and 1992. SCE staff met with NRC staff in October 1990 to discuss the plans for the SONGS 1 simulator. SCE subsequently submitted a new exemption request on November 2, 1990 and retracted the initial request. SCE revised their simulator construction and examination schedules such that all operating tests after May 26, 1991 will be administered using a certified simulator, so an exemption from 10 CFR 55.45(b)(2)(iv) will not be required.

SCE proposes to comply with 10 CFR 55.45(b) for SONGS 1 by certifying a plant-referenced simulator by February 5, 1992. SCE also proposes to conduct requalification examinations for SONGS 1 licensed operators in April of 1991 and then in October of 1992. SCE's proposal to conduct requalification

operating tests at an 18-month, rather than a 12-month, interval requires a one-time exemption from 10 CFR 55.59(a)(2). During the proposed exemption period, from May 26, 1991 until certification of the simulator, no initial or requalification operating tests are scheduled.

III.

The Commission has determined, pursuant to 10 CFR 55.11, that this exemption is authorized by law and will not endanger life or property and is otherwise in the public interest. Furthermore, the Commission has determined, pursuant to 10 CFR 50.12(a), that special circumstances of 10 CFR 50.12(a)(2)(v) are applicable in that the exemption would provide only temporary relief from the applicable regulation and the licensee has made good faith efforts to comply with the regulation. This exemption grants a temporary relief period of 10 months from the March 1991 date for submittal of the SONGS 1 simulation facility certification. Additionally, this one-time exemption allows the licensee to conduct requalification operating tests at an 18-month interval between April 1991 and October 1992. Good faith efforts to comply with the regulation were made as follows:

- (1) SCE formed the Utility Simulation Facility Group (USFG) to develop guidance for the use of nonplant-referenced simulators to meet 10 CFR 55.45. This group of four utilities was chaired by SCE and, on September 1, 1987, submitted the initial revision of a document entitled "Guidance for Development of a Simulation Facility to Meet the Requirements of 10 CFR 55.45."

- (2) On April 5, 1988, the USFG submitted the final revision of their guidance document after making changes which resulted from public meetings with the NRC in September and December of 1987.
- (3) On May 26, 1988, SCE submitted a plan, in accordance with 10 CFR 55.45(b)(1)(i), for the development and application for approval of a SONGS 1 simulation facility utilizing the Zion simulator.
- (4) On October 2, 1989, SCE informed the NRC that they would install a SONGS 1 plant-referenced simulator. This decision was prompted, in part, by the June 1, 1988, NRC response to the USFG guidance document and the January 3, 1989, NRC response to SCE's plan for development and application for approval.
- (5) On March 23, 1990, SCE submitted their initial exemption request which included conducting four sets of operating tests on a nonplant-referenced simulator after May 26, 1991.
- (6) On November 2, 1990, SCE submitted a new exemption request, after discussing it with the NRC in October 1990, which did not include conducting operating tests on a nonplant-referenced simulator after May 26, 1991, but did require a one-time schedular exemption from the annual requalification operating test requirement of 10 CFR 55.59(a)(2).

The Commission hereby grants an exemption from the schedular requirements of 10 CFR 55.45(b)(2)(iii) for submittal of Form NRC-474, "Simulation Facility Certification." This exemption is effective until February 5, 1992. Furthermore, the Commission hereby grants a one-time exemption from

the schedular requirement of 10 CFR 55.59(a)(2) by allowing an 18-month interval (April 1991 to October 1992) between requalification operating tests at SONGS 1.

Pursuant to 10 CFR 51.32, the Commission has determined that the issuance of the exemption will have no significant impact on the environment (56 FR 12284 March 22, 1991).

This exemption is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Bruce A. Boger, Director
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Dated at Rockville, Maryland
this 22nd day of March 1991.

UNITED STATES NUCLEAR REGULATORY COMMISSIONSOUTHERN CALIFORNIA EDISON COMPANYSAN DIEGO GAS AND ELECTRIC COMPANYSAN ONOFRE NUCLEAR GENERATING STATION, UNIT NO. 1DOCKET NO. 50-206ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an exemption from the requirements of 10 CFR 55.45(b)(2)(iii) and 10 CFR 55.59(a)(2) to the Southern California Edison Company, (the licensee), for the San Onofre Nuclear Generating Station, Unit No. 1, located in San Diego County, California.

ENVIRONMENTAL ASSESSMENTIdentification of Proposed Action

Regulations included under 10 CFR 55.45(b)(2)(iii) require the licensee to submit Form NRC-474, "Simulation Facility Certification," by March 26, 1991. Regulations included under 10 CFR 55.59(a)(2) require the licensee to conduct operator requalification examinations annually. By letter dated November 2, 1990, the licensee requested an extension for the submission date of Form NRC-474 from March 26, 1991, to no later than February 5, 1992. In the same letter a request was made to authorize a one-time extension of the operator requalification interval from 1 year to 18 months.

The proposed action is in accordance with 10 CFR 50.12 and 55.11, "Specific Exemptions," and is based on the information provided to the NRC in the licensee's request.

The Need for the Proposed Action

In 1987, 10 CFR 55.45 was revised to require operators to complete practical examinations on a certified plant reference simulator (PRS) or on an NRC-approved simulator. The licensee submitted a proposal in May 1988 to modify an existing simulator to comply with the revised requirements. In 1989 after interface with the NRC, the licensee concluded that it was not practical to modify the existing simulator to meet regulatory requirements and initiated plans to fabricate and install a PRS at the San Onofre site. Due to lead times associated with the development of the PRS, the two extensions identified above were requested.

Environmental Impacts of the Proposed Action

The proposed action will have no incremental environmental impact relative to current practices. The request to delay submission of the simulator certification is primarily a delay in fulfilling an administrative requirement and has no impact on the environment. A one-time extension of the operator requalification interval from 1 year to 18 months is not likely to have any effect on the environment.

Alternative to the Proposed Action

Since the Commission has concluded that the environmental effects of the proposed action are not significant, any alternative with equal or greater environmental impacts need not be evaluated.

The principal alternative would be to deny the requested exemption. This would not reduce the environmental impacts attributed to this facility.

Alternative Use of Resources

This action does not involve the use of any resources not previously considered in the "Final Environmental Statement related to operation of the San Onofre Nuclear Generating Station."

Agencies and Persons Consulted

The Commission's staff reviewed the licensee's request and did not consult other agencies or persons.

FINDING OF NO SIGNIFICANT IMPACT

The Commission has determined not to prepare an environmental impact statement for the proposed exemption.

Based upon the foregoing environmental assessment, we conclude that the proposed action will not have a significant effect on the quality of the human environment.

For further details with respect to this action, see the request for exemption dated November 2, 1990, which is available for public inspection at the Commission's Public Document Room, 2120 L Street, N.W., Washington, D.C. and at the Main Library, University of California, P.O. Box 19557, Irvine, California 92713.

Dated at Rockville, Maryland, this 15th day of March 1991.

FOR THE NUCLEAR REGULATORY COMMISSION

James E. Dyer

James E. Dyer, Director
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation