

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA	)	Docket No. 50-361
EDISON COMPANY, <u>ET AL.</u> for a Class 103	)	
License to Acquire, Possess, and Use	)	
a Utilization Facility as Part of	)	Amendment Application
Unit 2 of the San Onofre Nuclear	)	No.115
Generating Station	)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 115.

This amendment application consists of Proposed Technical Specification Change No. NPF-10-401 to Facility Operating License No. NPF-10. Proposed Technical Specification Change No. NPF-10-401 is a request to revise Technical Specifications Tables 3.3-3, 3.3-4, 3.3-5, and 4.3-2, "Engineered Safety Features Actuation System (ESFAS) Instrumentation." The proposed Technical Specification change will clarify that a Manual Safety Injection Actuation Signal does not actuate a Containment Cooling Actuation Signal. This is an editorial change to make the Technical Specifications consistent with plant design.

Subscribed on this 7th day of April, 1992

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: *Harold B. Ray*  
Harold B. Ray  
Senior Vice President

State of California  
County of ~~Orange~~ San Diego  
On April 7, 1992 before me, Linda L. Rulon/Notary Public,  
personally appeared Harold B. Ray, personally known  
to me (~~or-proved-to-me-on-the-basis-of-satisfactory-evidence~~) to be the  
person whose name is subscribed to the within instrument and acknowledged  
to me that he executed the same in his authorized capacity, and that by  
his signature on the instrument the person, or the entity upon behalf of  
which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature *Linda L. Rulon*



James A. Beoletto  
Attorney for Southern  
California Edison Company

By: *James A. Beoletto*  
James A. Beoletto

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Application of SOUTHERN CALIFORNIA	)	Docket No. 50-362
EDISON COMPANY, <u>ET AL.</u> for a Class 103	)	
License to Acquire, Possess, and Use	)	
a Utilization Facility as Part of	)	Amendment Application
Unit 3 of the San Onofre Nuclear	)	No.99
Generating Station)	)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 99.

This amendment application consists of Proposed Technical Specification Change No. NPF-15-401 to Facility Operating License No. NPF-15. Proposed Technical Specification Change No. NPF-15-401 is a request to revise Technical Specifications Tables 3.3-3, 3.3-4, 3.3-5, and 4.3-2, "Engineered Safety Features Actuation System (ESFAS) Instrumentation." The proposed Technical Specification change will clarify that a Manual Safety Injection Actuation Signal does not actuate a Containment Cooling Actuation Signal. This is an editorial change to make the Technical Specifications consistent with plant design.

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Senior Vice President

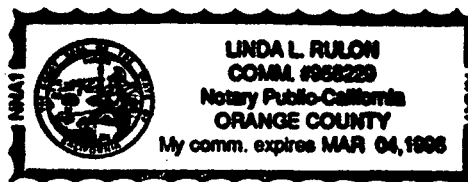
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Signature *Linda L. Rulon*



James A. Beoletto  
Attorney for Southern  
California Edison Company

By: *James A. Beoletto*  
James A. Beoletto

DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NPF-10/15-401

This is a request to revise Technical Specification (TS) 3/4.3.2, "Engineered Safety Feature Actuation Systems (ESFAS) Instrumentation," Tables 3.3-3, 3.3-4, 3.3-5, and 4.3-2.

Existing Specifications

Unit 2: Attachment "A"  
Unit 3: Attachment "B"

Proposed Specifications

Unit 2: Attachment "C"  
Unit 3: Attachment "D"

Description

TS 3/4.3.2 "Engineered Safety Features Actuation Systems (ESFAS) Instrumentation," Tables 3.3-3, 3.3-4, 3.3-5, and 4.3-2 list the surveillance and operability requirements of the Engineered Safety Feature Actuation Systems (ESFAS). Each of these tables lists the manual Safety Injection Actuation Signal (SIAS) as initiating a Containment Cooling Actuation Signal (CCAS). Plant design does not include initiation of CCAS by a manual SIAS.

This proposed change deletes item 6b, manual SIAS, from Tables 3.3-3, 3.3-4, and 4.3-2. Also, this change deletes Containment Emergency Cooling in item 1a, Manual SIAS, of Table 3.3-5. This editorial change makes the Technical Specifications (TSs) consistent with plant design and procedures.

Discussion

The following four affected tables in TS 3/4.3.2 "Engineered Safety Features Actuation Systems (ESFAS) Instrumentation" list the instrumentation, trip values, response times, and surveillance requirements for the ESFAS:

- Table 3.3-3, "ESFAS Instrumentation"
- Table 3.3-4, "ESFAS Instrumentation Trip Values"
- Table 3.3-5, "Engineered Safety Features Response Times"
- Table 4.3-2, "ESFAS Instrumentation Surveillance Requirements"

TS 3.3.2 requires ESFAS instrumentation channels in Table 3.3-3 to be OPERABLE with their trip setpoints consistent with the values in Table 3.3-4 and response times shown in Table 3.3-5. TS 4.3.2.1 requires ESFAS instrumentation to be demonstrated OPERABLE at the frequencies listed in Table 4.3-2.

As written, the TSs require surveillance and operability of a nonexistent channel for manual SIAS initiation of CCAS. Plant design, as shown in Figure 7.3-9 in the Updated Final Safety Analysis Report (UFSAR) for San Onofre Units 2 and 3, does not include initiation of CCAS by a manual SIAS. The automatic actuation logic resulting from low pressurizer pressure or high containment pressure initiates both an SIAS and a CCAS. However, SIAS remote manual logic initiates an SIAS only. The automatic actuation logic and remote manual logic proposed in this PCN are identical with the logic in Standard Technical

Specification 3/4.3.2.

The Containment Cooling System has normal operating functions as well as emergency operating functions. Therefore, CCAS has its own manual initiating logic so it can be operated independently of the Safety Injection System, which is only operated under accident conditions.

The correct actuation logic is also reflected in the normal operating procedures, the abnormal and emergency operating instructions, and the maintenance procedures for Units 2 and 3. Upon manually actuating an SIAS, Operations procedures require verification that CCAS has been initiated. In this case verification is defined as taking action to ensure CCAS has been initiated by manually initiating a CCAS.

The error listing manual SIAS as initiating a CCAS was in the original application for Facility Operating Licenses NPF-10 and NPF-15. This was not discovered until recently because the correct logic is shown consistently in the surveillance and operability procedures and training manuals. The error was discovered during research for the Technical Specification Improvement Project (TSIP).

Safety Analysis

The proposed change described 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

Manual SIAS was never intended to initiate CCAS. This is an editorial change correcting a previous mistake in the TSs. The error does not appear in any design documents or drawings, or any plant procedures. Deleting the requirements related to manual SIAS actuation of CCAS makes the TSs consistent with plant design and procedures. There is no change in plant design, operation, or configuration. Therefore, there is no significant increase in the probability or consequences of previously evaluated accidents.

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

Response: No

Manual SIAS was never intended to initiate CCAS. This is an editorial change correcting a previous mistake in the TSs. The error does not appear in any design documents or drawings, or any plant procedures. Deleting the requirements related to manual SIAS actuation of CCAS makes the TSs consistent with plant design and procedures. There is no change in plant design, operation, or configuration. This change does not create the possibility of a new

or different type of accident from those 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

Manual SIAS was never intended to initiate CCAS. This is an editorial change correcting a previous mistake in the TSs. The error does not appear in any design documents or drawings, or any plant procedures. Deleting the requirements related to manual SIAS actuation of CCAS makes the TSs consistent with plant design and procedures. There is no change in plant design, operation, or configuration. There is no reduction in a margin of safety.

#### 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 10CFR50.92; 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.