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 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 to amend Licenses NPF-10 & NPF-15, changing License Condition 2.C 14a & 2.C 12a to clarify reporting requirements re deviations from fire protection plan.

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 TITLE: Licensing Submittal: Fire Protection

NOTES: J Hanchett 1cy PDR Documents, ELD Chandler 1cy. 05000361
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 \$1,600

Southern California Edison Company



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December 2, 1983

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

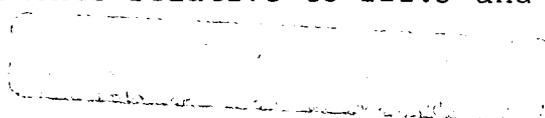
Gentlemen:

Subject: Docket No. 50-361 and 50-362
San Onofre Nuclear Generating Station, Units 2 and 3

Enclosed for your review and approval is a copy of a proposed change to License Conditions 2.C(14)a and 2.C(12)a of Facility Operating Licenses NPF-10 and NPF-15, respectively. The proposed change clarifies reporting requirements with respect to deviations from the Fire Protection Plan.

License Condition 2.G requires telephone notification within 24 hours, written confirmation no later than the next working day, and a written follow-up report within 14 days of any violation of License Condition 2.C(14)a and 2.C(12)a in Units 2 and 3, respectively. These License Conditions require that SCE "maintain in effect and fully implement all provisions of the approved Fire Protection Plan" and the various Safety Evaluation Reports published by NRR prior to, and concurrent with, the issuance of the Operating License for each unit.

SCE believes the Technical Specifications of Appendix A to each Operating License adequately address the operability of fire detection and protection equipment necessary to ensure availability of all safety related equipment in the units, including that related to Section III.G of Appendix R to 10 CFR 50 for "Fire Protection of Safe Shutdown Capability." Failure, degradation, or unavailability of such equipment is compensated for in accordance with the Action Statement associated with each Technical Specification Limiting Condition for Operation (LCO) and violations of such LCO's are required to be reported to NRC in accordance with both existing reporting requirements as well as those to become effective with 10 CFR 50.73 on January 1, 1984. Whereas Section III.J and III.O of Appendix R to 10 CFR 50 are not explicitly covered by Technical Specifications, the proposed change eliminates the redundant reporting requirement relative to Section III.G while maintaining the reporting requirements relative to III.J and III.O.



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\$ 1,400

Mr. George W. Knighton

-2-

December 2, 1983

Based on the discussions above and those included in the attached proposed change, SCE considers that the proposed change does not involve significant hazards considerations as defined by 10 CFR 50.92.

The proposed change is submitted by this letter, rather than by a formal amendment application, to facilitate the required pre-noticing in the Federal Register and processing of the amendment on a timely basis. A formal request for an amendment to Operating Licenses NPF-10 and NPF-15 will be submitted by December 30, 1983. In accordance with 10 CFR 170.22, this change has been determined to constitute a Class II amendment for Unit 2 and a Class I amendment for Unit 3. Accordingly, a check for \$1,600.00 is enclosed.

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

Very truly yours,

M. D. Medford

Enclosure

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

DESCRIPTION OF PROPOSED CHANGE NPF-10/15-98 AND SAFETY EVALUATION

This is a request to revise License Conditions 2.C(14)a and 2.C(12)a, Fire Protection, of Facility Operating Licenses NPF-10 and NPF-15, respectively.

Existing License Conditions

Unit 2

2.C (14) Fire Protection (Section 9.5.1, SER, SSER #4, SSER #5, Section 1.12, SSER #5)

- a. SCE shall maintain in effect and fully implement all provisions of the approved Fire Protection Plan as amended through Amendment 10 and the NRC staff's Fire Protection Review described in the SER and Supplements 4 and 5 to the SER.

Unit 3

2.C (12) Fire Protection (Section 9.5.1, SER, SSER #4, SSER #5, Section 1.12, SSER #5)

- a. SCE shall maintain in effect and fully implement all provisions of the approved Fire Protection Plan as amended through Amendment 12 and the NRC staff's Fire Protection Review described in the SER, Supplements 4 and 5 to the SER, and in the Safety Evaluation issued with this license. In addition, SCE shall meet the technical requirements of Section III.G, "Fire Protection of Safe Shutdown Capability," III.J "Emergency Lighting," and III.O "Oil Collection System for Reactor Coolant Pump" of Appendix R to 10 CFR 50.

Proposed License Conditions

Units 2 and 3

Add the following sentence to each unit's existing license condition:

"Only those deviations from the Fire Protection Plan that violate the requirements of Section III.G, III.J, and III.O of Appendix R to 10 CFR 50 and are not otherwise subject to Technical Specification Limiting Conditions for Operation shall be reported in accordance with License Condition 2.G."

Reason for Proposed Change

The purpose of this proposed change is to clarify the redundant reporting requirements of San Onofre Units 2 and 3 License Condition 2.G as it pertains to the Fire Protection License Conditions 2.C.(14) of Unit 2 License NPF-10 and 2.C.(12) of Unit 3 License NPF-15.

Technical Specification Limiting Conditions for Operation (LCO) 3.3.3.7, 3.7.8.1, 3.7.8.2, 3.7.8.3, and 3.7.9, as well as their associated Action Statements and Surveillance Requirements are intended to ensure that fire detection and protection systems associated with safety related equipment are maintained in a condition to perform their intended function or that compensatory measures are indeed in place. Violation of these Technical Specifications is reportable under existing Technical Specification reporting requirements as well as 10 CFR 50.73 which will become effective January 1, 1984.

The provisions of the Fire Hazards Analysis were implemented by virtue of design and construction under an approved and effective Quality Assurance program. They are maintained in effect by compliance with Technical Specification Limiting Conditions for Operation and failure to do so is detected by completion of the associated surveillance activity.

Southern California Edison does not believe it is the intent of License Condition 2.G to require the reporting of isolated instances of failure or degradation of fire rated assemblies or other provisions of the Fire Hazards Analysis as a violation of the License Condition on fire protection. Clearly, such minor deviations from the Fire Hazards Analysis are not significant events requiring immediate notification where Commission action may be required to protect the public health and safety, and requiring such reporting is inconsistent with current NRC rule changes intended to reduce the administrative burden on licensees of reporting insignificant events having little or no impact on public health and safety. (Ref. FR-Vol. 48, No. 44/July 26, 1983)

Implementation of modifications to comply with the provisions of Section III.G, III.J, and III.O of Appendix R to 10 CFR 50 were accepted by the NRC staff as satisfying the provisions of Appendix A to Branch Technical Position BTB-APCSB 9.5-1 and reflected in the staff fire protection safety evaluation reports issued concurrent with the San Onofre Units 2 and 3 Operating License. Sections III.J and III.O of Appendix R are not explicitly addressed by Technical Specification Limiting Conditions for Operation, however, Section III.G, "Fire Protection of Safe Shutdown Capability," is indirectly addressed by the Technical Specification LCO's in that all fire detection and suppression measures provided in both Units 2 and 3 by design are intended for the protection of all safety related equipment required to prevent or mitigate the consequences of an accident.

The Technical Specification LCO's address the impairment of fire protection system components such as the damage to or absence of fire retardant cable wrapping on a small section of the miles of cable raceways or the degradation of a few of the many thousands of fire barrier penetration seals existing in the units. Compensatory measures required to be in place within one hour of defect discovery adequately preserves the fire detection and protection intended for all safety related equipment, including that required for safe shutdown of the unit. Informing NRC within 24 hours by telephone, confirming by telegram, mailgram, or facsimile transmission no later than the first working day after discovery of such minor deviations and providing a written follow-up report within 14 days, as required by License Condition 2.G, is inconsistent with Technical Specifications that currently require only a 30 day written report for such occurrences and which will require no report at all after 10 CFR 50.73 becomes effective on January 1, 1984.

In summary, SCE requests that the reporting requirements of License Condition 2.G be clarified in regard to the reporting of minor deviations from the Fire Hazards Analysis by the addition of the proposed statement to the Fire Protection License Conditions as indicated above.

Safety Evaluation

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 proposed change does not affect the accident analysis or Technical Specification requirements.

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 clarifies SCE's requirements with respect to the Fire Protection Plan for San Onofre Unit 2 and 3. This clarification does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Will the 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.

The proposed clarification of the License Condition is similar to example (i) of amendments not likely to involve a significant hazards consideration published in 48 FR 14864 dated April 6, 1983 in that it is essentially administrative in nature.

Safety and Significant Hazards Consideration Determination

Based on the Safety Evaluation, 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.