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 MIRAGLIA, F. Licensing Branch 3

SUBJECT: Forwards revised description of 820521 proposed change to License NPF-10 to make Tech Specs consistent w/current valve time response requirements.

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*Southern California Edison Company*



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May 22, 1982

Director, Office of Nuclear Reactor Regulation  
Attention: Mr. Frank Miraglia, Branch Chief  
Licensing Branch No. 3  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-361  
San Onofre Nuclear Generating Station  
Unit 2

SCE's letter of May 21, 1982 transmitted a proposed change to Technical Specification No. 3.3.2, Table 3.3-5 items 2.a(5)b, 3.a(4)b and associated NOTE 4, ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION for San Onofre Nuclear Generating Station Unit 2(Operating License NPF-10). The May 21, 1982 letter requested revisions to the technical specifications consistent with current valve response time requirements.

Consistent with discussions with the NRC(Mr. H. Rood) on May 22, 1982 enclosed please find further clarification which replaces the "Reason for Proposed Change" of the enclosure to the May 21, 1982 letter. A formal request for an amendment to Operating License No. NPF-10 incorporating the enclosed clarification into the proposed change which was transmitted to the NRC on May 21, 1982 will be submitted to the NRC during the week of June 1, 1982. The formal request will include a check in the amount of \$1,200.00 for this change which has been determined to be a Class II change in accordance with 10CFR170.22.

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

Very truly yours,

for M. O. Medford  
Supervising Engineer  
San Onofre Units 2 and 3 Licensing

BOO!  
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8205260026 *Q*

DESCRIPTION OF PROPOSED CHANGE NPF-10-18 AND SAFETY ANALYSIS  
OPERATING LICENSE NPF-10

Revise "Reason for Proposed Change" as follows:

Reason for Proposed Change

The response time of containment emergency cooler CCW isolation valves must be limited by the Technical Specifications in order to assure that the containment emergency cooler system will operate in accordance with the specific assumptions of the containment pressure analyses (as described in FSAR Section 6.2, Tables 6.2-25 and 6.2-26). The CCW non-critical loop isolation valves were inadvertently listed in lieu of the containment emergency cooler CCW isolation valves in the Technical Specifications; in addition, the implied 10 second stroke time for the valves has been revised to 12 seconds per FSAR Amendment 29 and the previously omitted 10 second allowance for emergency diesel operator starting and load sequencing has been added since these are A-C motor operated valves, making a correct total response time of 23.2/23.0 seconds in lieu of 11.2/11.0 seconds for these valves.

Although a response time limit for the CCW non-critical loop isolation valves is not required by the containment pressure analyses (as described in FSAR Section 6.2, Tables 6.2-25 and 6.2-26), the high energy line break analyses (described in FSAR Section 3.6) do require a response time limit for these valves to ensure integrity of the CCW critical loops following the rupture of non-critical loop piping by certain large-break LOCA's. It is therefore prudent to retain a Technical Specification limit on CCW non-critical loop isolation valve response time; the correct stroke time limit for these valves is 20 seconds, in lieu of the 10 seconds which pertained to the containment emergency cooler CCW isolation valves. (Since these are pneumatic valves, the 10 seconds for emergency diesel generator starting and load sequencing do not apply.)