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 AUTH. NAME AUTHOR AFFILIATION
 BASKIN, K. P. Southern California Edison Co.
 RECIP. NAME RECIPIENT AFFILIATION
 MIRAGLIA, F. Licensing Branch 3

SUBJECT: Forwards proposed change to Tech Spec 3.3.2 re current valve response time requirements.

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Southern California Edison Company



P. O. BOX 800
2244 WALNUT GROVE AVENUE
ROSEMEAD, CALIFORNIA 91770

K. P. BASKIN
MANAGER OF NUCLEAR ENGINEERING,
SAFETY, AND LICENSING

May 21, 1982

TELEPHONE
(213) 572-1401

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

Enclosed for your review and approval is a copy of 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 proposed change is a request to revise the technical specifications consistent with current valve response time requirements.

NRC approval of the proposed change is requested to facilitate the entry of Unit 2 into Operational Mode 3 which may occur as early as Friday, May 21, 1982. A formal request for an amendment to Operation License No. NPF-10 detailing this proposed change will be transmitted 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,

K.P. Baskin

Enclosure

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

This is a request to revise Appendix "A" Technical Specification 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.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

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.

Safety Analysis of Proposed Change

The containment pressure analyses (described in FSAR Section 6.2, Tables 6.2-25 and 6.2-26) assume a specific maximum response time for the containment emergency cooler CCW isolation valves (i.e., a 12 second valve stroke time). Including the applicable load sequencing and emergency diesel generator starting time for these ac motor operated valves (10 seconds), and SIAS instrumentation and logic response times (1.2 seconds for pressurizer pressure-low, 1.0 seconds for containment pressure-high), the required Technical Specification limit for overall response time of this safety function is 23.2 seconds (pressurizer pressure-low) and 23.0 seconds (containment pressure-high), as marked. Inclusion of these limits for valves HV-6366 through HV 6373 will assure compliance of the containment emergency cooling function to the safety analysis response time assumptions.

The CCW non-critical loop isolation valves are required to close in order to preserve the integrity of the connected critical loop should any of the non-critical loop piping inside containment be impinged in the course of a

high energy line break (described in FSAR Section 3.6). Including the applicable SIAS instrumentation and logic response times, the required Technical Specification limit for overall response time of this safety function is 21.2 seconds (pressurizer pressure-low) and 21.0 seconds (containment pressure-high), as marked. Inclusion of these limits for valves HV-6212, HV-6213, HV-6218 and HV-6219 will assure compliance of the containment emergency cooling function to the safety analysis response time assumptions.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-18 does not involve an unreviewed safety question as defined in 10 CFR 50.59, nor does it present significant hazard considerations not described or implicit in the Final Safety Analysis; (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.



NPF-10-18

ATTACHMENT A