

BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, <u>ET AL.</u> for a Class 103 license to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 2 of the San Onofre Nuclear Generating Station	) ) ) ) )	DOCKET NO. 50-361  Amendment Application No. 4
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SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90,  
hereby submit Amendment Application No. 4.

This amendment application consists of Proposed Changes NPF-10-18  
and NPF-10-19 to Technical Specifications incorporated in Facility Operating  
License No. NPF-10 as Appendix A. Proposed Change NPF-10-18 is a request to  
revise Technical Specification 3.3.2 to clarify Table 3.3-5, Items 2.a(5)(b)  
and 3.a(4)b. Proposed Change NPF-10-19 is a request to revise Technical  
Specification 3.3.2 to clarify Table 3.3-5, Items 8.a(2) and 9.a(2).

Pursuant to 10 CFR 170.22 proposed changes contained in Amendment  
Application No. 4 are considered to constitute a Class II Amendment. The  
basis for the determination is that the changes have no safety or  
environmental significance.

Accordingly, the fee of \$2,400.00 corresponding to this  
determination is remitted herewith as required by 10 CFR 170.22.

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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 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.)

Rev. 1

### 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

Existing Specification:

2. Pressurizer Pressure-Low

a. SIAS

- |                                    |                |
|------------------------------------|----------------|
| (1) Safety Injection               |                |
| (a) High Pressure Safety Injection | 31.2*          |
| (b) Low Pressure Safety Injection  | 41.2*          |
| (2) Control Room Isolation         | Not Applicable |
| (3) Containment Isolation (NOTE 3) | 11.2* (NOTE 2) |
| (4) Containment Spray (Pumps)      | 25.6*          |
| (5) Containment Emergency Cooling  |                |
| (a) CCW Pumps                      | 31.2*          |
| (b) CCW Valves (NOTE 4)            | 11.2           |
| (c) Emergency Cooling Fans         | 21.2*          |

3. Containment Pressure-High

a. SIAS

- |                                    |                |
|------------------------------------|----------------|
| (1) Safety Injection               |                |
| (a) High Pressure Safety Injection | 41.0*          |
| (b) Low Pressure Safety Injection  | 41.0*          |
| (2) Control Room Isolation         | Not Applicable |
| (3) Containment Spray (Pumps)      | 25.4*          |
| (4) Containment Emergency Cooling  |                |
| (a) CCW Pumps                      | 31.0*          |
| (b) CCW Valves                     | 11.0 (NOTE 4)  |
| (c) Emergency Cooling Fans         | 21.0*          |

NOTES:

1. Response times include movement of valves and attainment of pump or blower discharge pressure as applicable.
- \* Emergency diesel generator starting delay (10 sec.) and sequence loading delays for SIAS are included.
2. Response time includes emergency diesel generator starting delay (applicable to AC motor operated valves other than containment purge valves), instrumentation and logic response only. Refer to Table 3.6-1 for containment isolation valve closure times.
3. All CIAS-Actuated valves except MSIVs and MFIVs.
4. CCW non-critical loop isolation valves 2HV-6212, 2HV-6213, 2HV-6218 and 2HV-2619.
5. Response time includes instrumentation, logic, and isolation damper closure times only.

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ATTACHMENT B

Proposed Specification:

2. Pressurizer Pressure-Low

a. SIAS

(1) Safety Injection	
(a) High Pressure Safety Injection	31.2*
(b) Low Pressure Safety Injection	41.2*
(2) Control Room Isolation	Not Applicable
(3) Containment Isolation (NOTE 3)	11.2* (NOTE 2)
(4) Containment Spray (Pumps)	25.6*
(5) Containment Emergency Cooling	
(a) CCW Pumps	31.2*
(b) CCW Valves (NOTE 4a)	21.2
(c) CCW valves (NOTE 4b)	23.2*
(d) Emergency Cooling Fans	21.2*

3. Containment Pressure-High

a. SIAS

(1) Safety Injection	
(a) High Pressure Safety Injection	41.0*
(b) Low Pressure Safety Injection	41.0*
(2) Control Room Isolation	Not Applicable
(3) Containment Spray (Pumps)	25.4*
(4) Containment Emergency Cooling	
(a) CCW Pumps	31.0*
(b) CCW Valves (NOTE 4a)	21.0
(c) CCW Valves (NOTE 4b)	23.0*
(d) Emergency Cooling Fans	21.0*

NOTES:

1. Response times include movement of valves and attainment of pump or blower discharge pressure as applicable.
- \* Emergency diesel generator starting delay (10 sec.) and sequence loading delays for SIAS are included.
2. Response time includes emergency diesel generator starting delay (applicable to AC motor operated valves other than containment purge valves), instrumentation and logic response only. Refer to Table 3.6-1 for containment isolation valve closure times.

3. All CIAS-Actuated valves except MSIVs and MFIVs.
- 4a. CCW non-critical loop isolation valves 2HV-6212, 2HV-6213, 2HV-6218 and 2HV-2619 close.
- 4b. Containment emergency cooler CCW isolation valves 2HV-6366, 2HV-6367, 2HV-6368, 2HV6369, 2HV6370, 2HV6371, 2HV6372, 2HV6373 open.
5. Response time includes instrumentation, logic, and isolation damper closure times only.



DESCRIPTION OF PROPOSED CHANGE NPF-10-19 AND SAFETY ANALYSIS

This is a request to revise Appendix "A" Technical Specification 3.3.2, Table 3.3-5.

ENGINEERED SAFETY FEATURES RESPONSE TIMES

EXISTING SPECIFICATION:

See Attachment "A"

PROPOSED SPECIFICATION:

Page 3/4 3-13 Add to the end of Surveillance Requirement 4.3.2.3: "The provisions of specification 4.0.4 are not applicable for entry into Mode 3 for items 8.a(2) and 9.a(2) of Table 3.3-5."

Page 3/4 3-29 Add "(Note 6)" after items 8.a(2) and 9.a(2) of Table 3.3-5.

Page 3/4 3-30 Add Note 6 as follows:

"6. The provisions of specification 4.0.4 are not applicable for entry into Mode 3."

SAFETY ANALYSIS:

The turbine driven auxiliary feedwater pump is not tested for operability, as specified in Specification 4.7.1.2.1.a.1, until after entry into Mode 3, when adequate steam pressure exists in steam generators to permit the pump to function as designed. This change is consistent with such requirements since proper determination of ESF response times for the turbine driven auxiliary feedwater pump is dependent upon having adequate steam pressure available.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-19 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.

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ATTACHMENT A