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 MIRAGLIA, F. Licensing Branch 3

SUBJECT: Forwards requests for NRC approval to revise proposed changes to Tech Spec 3.3.2, Table 3.3-5 re response time testing for auxiliary feedwater train. Formal amend application will be submitted by 820531.

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

May 20, 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 NPF-10-19 to Technical Specification 3.3.2, Table 3.3-5, Item 8.a(2) and Item 9.a(2) for San Onofre Nuclear Generating Station, Unit 2, incorporated in Facility Operating License NPF-10 as Appendix A. The proposed change is a request to clarify that response time testing for Auxiliary Feedwater Train identified in Table 3.3-5 is not required for entry into Mode 3.

NRC approval of the proposed change is requested to facilitate the entry of Unit 2 into Operational Mode 3. A formal request for an amendment to Facility Operating License No. NPF-10 detailing this proposed change will be transmitted to the NRC during the week of May 31, 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 10 CFR 170.22.

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

Very truly yours,

M. D. Medford for KPB

Enclosure

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PDR ADOCK 05000361
PDR

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 Add to the end of Surveillance Requirement 4.3.2.3: "The provisions
3/4 3-13 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 Add "(Note 6)" after items 8.a(2) and 9.a(2) of Table 3.3-5.
3/4 3-29

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

"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.

HRP:4307