BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. 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

SOUTHERN CALIFORNIA EDISON COMPANY, <u>ET AL.</u> pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 7.

This amendment application consists of Proposed Changes NPF-10-24 to Facility Operating License No. NPF-10, Technical Specifications incorporated as Appendix A. Proposed Change NPF-10-24 is a request to revise Technical Specification 3.3.3.7, Table 3.3-11, FIRE DETECTION INSTRUMENTS MINIMUM INSTRUMENTS OPERABLE; and Technical Specification 3.7.8.2, Table 3.7-5, Safety Related Spray and/or Sprinkler Systems.

Pursuant to 10 CFR 170.22 proposed changes contained in Amendment Application No. 7 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 \$1,200.00 corresponding to this determination is remitted herewith as required by 10 CFR 170.22.

Subscribed on this 13th day of July 1982.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

Ву

Robert Dietch

Subscribed and sworn to before me this

12 th day of

of July 1982

Notary Public in and for the County of Los Angeles, State of California

My Commission Expires: lug 27 1982

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AGNES CRABTREE

PRINCIPAL OFFICE IN
LOS ANGELES COUNTY

My Commission Exp. Aug. 27, 1982

Charles R. Kocher James A. Beoletto Attorney for Southern California Edison Company

By Amy A Beofile

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SAN DIEGO GAS & ELECTRIC COMPANY

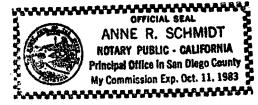
G.D. Cotton

David R. Pigott Samuel B. Casey Orrick, Herrington & Sutcliffe Attorneys for San Diego Gas & Electric Company

David R. Pigott

Subscribed and sworn to before me this 13 day of July 1982.

Notary Public in and for the City and County of San Diego, California



THE CITY OF ANAHEIM

Gordon W. Hoyt

Alan R. Watts Rourke & Woodruff Attorney for the City of Anaheim

Subscribed and sworn to before me day of July

OFFICIAL SEAL J. RICHARD SANTO Notary Public-California ORANGE COUNTY My Commission Expires Aug. 13, 1982

Notary Public in and for the County of ORANGE. State of California THE CITY OF RIVERSIDE

Everett C. Ross

Alan R. Watts Rourke & Woodruff Attorney for the City of Riverside

By alan R. Watts

Subscribed and sworn to before me **/**, 1982. this 12 day of

and for the County

State of California

DONNA L. MULLER
Notary Public, State of New Years
No. 4755770
Qualified in Kings County
Commission Expires March 30, 198.

DESCRIPTION OF PROPOSED CHANGE NPF-10-24 AND SAFETY ANALYSIS AMENDMENT APPLICATION NO. 7 OPERATING LICENSE NPF-10

This is a request to revise Technical Specification 3.3.3.7, Table 3.3-11, FIRE DETECTION INSTRUMENTS MINIMUM INSTRUMENTS OPEABLE; and Technical Specification 3.7.8.2, Table 3.7-5, Safety Related Spray and/or Sprinkler Systems.

Existing Specification

See Attachment "A"

Proposed Specification

See Attachment "B"

Reason for Proposed Changes

Technical Specification 3.3.3.7, Table 3.3-11

Zone 1 The 14 flame detectors listed in the cable tray areas are ultraviolet (UV) detectors and may not operate in the expected radiation environment. The proposed change is required to reflect the replacement of the 14 UV detectors by 23 ionization smoke detectors which will operate in the expected radiation environment and provide equivalent fire detection capability.

The single smoke detector listed in the 63'3" elevation cable tray area is actually located in the Elevator Machinery Room as is reflected by the proposed change.

Thirty-two UV flame detectors provided for early warning in the combustible oil area (Reactor Coolant Pump Area) were inadvertently listed as smoke detectors in the actuation column. The UV detectors will not operate in the expected radiation environment. The reactor coolant pump oil collection system in combination with a heat actuated deluge-water spray system provides adequate fire protection without the UV flame detectors. The proposed change reflects the removal of the 32 UV detectors located in the combustible oil area.

The two heat detectors listed in the actuation column for the charcoal filter area are moved to early warning column to facilitate conversion of the charcoal filter deluge-water spray system from automatic to manual operation.

Zone 9 The heat detectors listed in the actuation column for Emergency AC Units in Rooms 301 and 309 are moved to the early warning column to facilitate conversion of the charcoal filter deluge-water spray systems from automatic to manual operation.

- Zone 28 The two heat detectors listed in the actuation column are moved to the early warning column to facilitate conversion of the charcoal filter deluge-water spray system from automatic to manual operation.
- Zone 32A The two heat detectors listed in the actuation column are moved to the early warning column to facilitate conversion of the charcoal filter deluge-water spray systems from automatic to manual operation.
- Zone 32B Two heat detectors are added to the early warning column. These two detectors provide early warning of a charcoal filter fire enabling manual actuation of the charcoal filter deluge-water spray system.
- Zone 72 Corridor 401, which contains safe shutdown equipment, was erroneously identified as corridor 442 in the existing specification.

Technical Specification 3.7.8.2, Table 3.7-5

Spray and/or sprinkler systems listed in Table 3.7-5 were re-examined to ensure consistency with the following criteria. The Technical Specifications should include those spray/sprinkler systems which

- o protect redundant trains of safety related equipment not separated by a three hour fire rated barrier;
- o protect non-safety related equipment which could be a fire hazard to otherwise unprotected redundant trains of safety related equipment located in the same area; or
- o protect areas/equipment where fire significantly increases the risk of a radioactive release to the environment.

Charcoal Filter A-353

There is no safety related equipment or cabling in the vicinity of this charcoal filter. Nor would a fire in this charcoal filter significantly increase the risk of a radioactive release to the environment. Therefore, the deluge-water spray system does not meet the above criteria and is deleted from Table 3.7-5.

Emergency AC Unit - Train A Emergency AC Unit - Train B

A note is added to indicate the conversion of the automatic deluge-water spray systems protecting the charcoal filters to manual operation and clarify surveillance requirement 4.7.8.2.d.1.a.

Charcoal Filter E-419 and Charcoal Filter A-206

These filters are located in Room 233 in the Control Building and are protected by deluge-water spray systems. Both train A and B safe shutdown equipment is located in this room. A wet pipe sprinkler system was installed in this room to protect the train A and B safe shutdown equipment. As a

result, the charcoal filter deluge-water spray systems do not meet the critria for inclusion and are therefore deleted from Table 3.7-5. The wet pipe sprinkler system is added to the table because it meets the criteria in that it protects redundant trains of safe shutdown equipment located in this area.

HVAC Room 309A; Corridor 303
Auxiliary Feedwater Pump Room
Fan Room 233 and Corridor 234
Salt Water Cooling Pumps
Salt Water Cooling Tunnel
CCW Heat Exchangers and Piping Room; AC Room 017
Corridor 401
Corridor 105

The spray and/or sprinkler systems listed are added to Table 3.7-5 because they meet the criteria for inclusion in that they protect redundant trains of safe shutdown equipment.

Safety Analysis of Proposed Change

Fire detection instrumentation ensures that adequate warning capability is available for the prompt detection of fires. This capability is required to detect and locate fires in their early stages, thus reducing the potential for damage to safety related equipment. Replacement of the UV detectors in the cable tray areas of containment with 23 ionization smoke detectors results in no reduction of fire detection capability. The reactor coolant pump oil collection system in combination with heat detectors and a deluge-water spray system provides adequate fire protection without UV detectors in the combustible oil area of containment.

Conversion of the charcoal filter deluge-water spray systems from automatic to manual operation provides adequate fire protection and enhances the availability of the charcoal filters by reducing the probability of spurious dousing of the charcoal. Because of the slow burning nature of charcoal fires, additional damage resulting from the time delay associated with manual actuation is insignificant when compared with the potential damage resulting from spurious dousing of the charcoal filter by the automatically actuated system.

Safety related spray and/or sprinkler systems ensure that redundant trains of safety related equipment will not be incapacitated by a single fire or that fire will not significantly increase the risk of a release of radioactivity to the environment. Deluge water-spray systems protecting three charcoal filters are deleted from Table 3.7-5. A single fire in any of these charcoal filters would not incapacitate redundant trains of safety related equipment nor would a fire increase the risk of a radioactive release to the environment. Additional spray and/or sprinkler systems were identified which protect redundant trains of safe shutdown equipment. The inclusion of these systems in Table 3.7-5 ensures fire suppression capability in areas containing redundant trains of equipment.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-24 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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