Southern California Edison Company



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ROBERT DIETCH VICE PRESIDENT

August 16, 1982

TELEPHONE 213-572-4144

Mr. H. R. Denton, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D. C. 20555

Gentlemen:

Subject: Docket No. 50-361

Amendment Application No. 9

San Onofre Nuclear Generating Station

Unit 2

Enclosed are three executed and thirty-seven conformed copies of Amendment Application No. 9 to Operating License NPF-10 for San Onofre Nuclear Generating Station, Unit 2. Amendment Application No. 9 consists of Proposed Change NPF-10-26 to Facility Operating License No. NPF-10, Technical Specifications incorporated as Appendix A.

Proposed Change NPF-10-26 is a request to revise Technical Specification 3.7.1.3 CONDENSATE STORAGE TANK. Proposed Change NPF-10-26 would base the minimum required inventory in the condensate storage tank T-121 on the maximum power level achieved to date.

It is respectfully requested that Amendment Application No. 9 be reviewed promptly and appropriate action taken. Direct distribution of Amendment Application No. 9 to Facility Operating License NPF-10 will be made in accordance with the service list provided in SCE's letter of August 2, 1982 to the Commission. An affidavit attesting to the fact that distribution has been completed will be submitted within ten days of amendment docketing.

The proposed change contained in Amendment Application No. 9 is considered to constitute a Class II amendment based on the determination that this change has no safety or environmental significance. Accordingly, enclosed is Southern California Edison Company's check in the amount of laket Litch wholesh: \$1,200.00 as required by 10 CFR 170.22.

Enclosure

8208180049 820816 PDR ADOCK 05000361 ACCESSION NBR:8208180049 DOCLDATE: 82/08/16 NOTARIZED: YES DOCKET: #: FACIL:50-361 San Onotine Nuclear Station, Unit 2, Southern Californ, 05000361.

AUTH. NAME

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AUTHOR AFFILITATION

DIETCH.R. RECIPENAME Southern Childfornia Edison Co. RECIPIENT AFFILIATION

DENTON, H.R.

Diffice of Nuclear Reactor Regulation, Director:

SUBJECT: Amend Application: 9 consisting of Proposed Change NPF=10=26 to License NPF=10. Amend revises Tech Spec. 3.7.1.3 recondensate storage tank inventory.

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	NRR/DHFS/PITRE	320	1	1.	NRR/DSI/AEB	26	1	1
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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

No. 9

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 9.

This amendment application consists of Proposed Change NPF-10-26 to Facility Operating License No. NPF-10, Technical Specifications incorporated as Appendix A. Proposed Change NPF-10-26 is a request to revise Technical Specification 3.7.1.3 CONDENSATE STORAGE TANK.

Pursuant to 10 CFR 170.22 proposed change contained in Amendment Application No. 9 is considered to constitute a Class II Amendment. The basis for the determination is that the change has 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 16th day of lugust 1982. Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

Robert Dietch

Subscribed and sworn to before me this

16th day of

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

My Commission Expires: (lug 27.1982

AGNES CRABTREE NOTARY PUBLIC - CALIFORNIA PRINCIPAL OFFICE IN OS ANGELES COUNTY

My Commission Exp. Aug. 27, 1982

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

SAN DIEGO GAS & ELECTRIC COMPANY

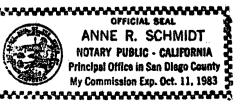
G.D. Cotton

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

By David R Prost

Subscribed and sworn to before me this 10 day of Queguet 1983.

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



THE CITY OF ANAHEIM

Ву

Gordon W. Hoyt

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

By alan R. Watts



OFFICIAL SEAL J. RICHARD SANTO Notary Public-California ORANGE COUNTY

My Commission Expires Aug. 13, 1982

Subscribed and sworn to before me __ day of <u>AUGUST</u>, 1982.

, State of California

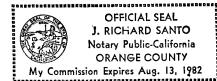
THE CITY OF RIVERSIDE

Ву

Everett C. Ross

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

By allen R. Watts



Subscribed and sworn to before me this 4 day of <u>AUGUS</u>, 1982.

Notary Public in and for the County of ORANGE, State of California

DESCRIPTION OF PROPOSED CHANGE NPF-10-26 AND SAFETY ANALYSIS

AMENDMENT APPLICATION NO. 9 OPERATING LICENSE NPF-10

This is a request to revise Technical Specification 3.7.1.3 CONDENSATE STORAGE TANK

Existing Specification

See Attachment "A".

Proposed Specification

See Attachment "B".

Reason for Proposed Change

Numerous violations of Technical Specification 3.7.1.3 have occurred due to difficulty in controlling the level in T-121 during operation of the auxiliary feedwater system. The permanent solution is to install a automatic level control system and this design change is in progress. The current technical specification requires that a minimum of 144,000 gallons be maintained in T-121. This volume is sufficient for two hours of operation at hot standby followed by plant cooldown to 400° F, the maximum temperature at which the shutdown cooling system can be used to remove decay heat. This volume is based on assumptions of loss of offsite power, failure of one atmospheric dump valve and an initial plant power level of 100% with sufficient operating history to develop the maximum amount of decay heat. Prior to initial operation at 100% power, the operating history will be less than that required to develop this maximum amount of decay heat, resulting in correspondingly lower feedwater requirements. The proposed change would ensure an adequate feedwater inventory in T-121 and would minimize the probability of violations of this technical specification prior to completion of the design change which is expected before operation at 100% power.

Safety Analysis of Proposed Change

Tne requirement for a minimum inventory in the condensate storage tank T-121 ensures that sufficient feedwater is available for two hours of operation at hot standby followed by cooldown to 400°F , at which point the shutdown cooling system can be used to remove decay heat. The volume that is required to be maintained in T-121 by the current technical specification is based on initial operation at 100% power and sufficient operating history to develop the maximum amount of decay heat. Prior to operation at 100% power, the operating history will be less than that required to buildup this maximum amount of decay heat. Therefore, the feedwater requirements are correspondingly lower. The proposed change would ensure an adequate feedwater inventory in T-121 for 2 hours at hot standby followed by plant cooldown to $400^{0}\mathrm{F}$, for the maximum decay heat which may be present at the time. The minimum inventories to be maintained in tank T-121 were calculated as the sum of the feedwater required for decay heat removal from standard fission product decay energies for various plant operating histories and the feedwater required for cooldown to shutdown cooling entry conditions. For conservatism, a +2% uncertainty for core thermal power, a +10% uncertainty in decay heat

and a +20% uncertainty for the minimum inventory required at 0% power were assumed. In addition, the proposed change leaves intact the minimum 280,000 gallon feedwater inventory which is required to be maintained in T-120 by Technical Specification 3.7.1.3.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-26 does not 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.

PSmith: 4899

ATTACHMENT "A"