

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. 11
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SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90,
hereby submit Amendment Application No. 11.

This amendment consists of Proposed Changes NPF-10-9, NPF-10-15,
NPF-10-16, NPF-10-21, NPF-10-23, NPF-10-27, NPF-10-29, and NPF-10-34 to
Technical Specifications incorporated in Facility Operating License No. NPF-10
as Appendix A. Proposed Change NPF-10-9 is a request to revise Appendix A
Technical Specification 4.4.5.2.2.c and 4.4.5.2.2.d to clarify RCPB Valve Test
requirements. Proposed Change NPF-10-15 is a request to revise Appendix A
Technical Specification 3.4.1.4.1, Cold Shutdown with Loops Filled. Proposed
Change NPF-10-16 is a request to revise Appendix A Technical Specification
4.6.2.1.b.4 to eliminate the need to send personnel up to the 143 foot level
of the containment structure when filling the containment spray header riser.
Proposed Change NPF-10-21 is a request to revise Appendix A Technical
Specification 6.9.1.13.b Administrative Controls. Proposed Change NPF-10-23
consists of various editorial and typographical errors identified in
Appendix A Technical Specifications. Proposed Change NPF-10-27 consists of
various editorial and typographical errors, and resolves several
inconsistencies in Appendix A Technical Specifications. Proposed Change
NPF-10-29 is a request to revise the bases of Technical Specification 3.6.1.4,
Internal Pressures. Proposed Change NPF-10-34 is a request to revise
Table 2.2-1 of Technical Specification 2.2.1, Reactor Coolant Flow-Low.

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Pursuant to 10 CFR 170.22, the proposed changes contained in Amendment Application No. 11 are considered to constitute a Class II Amendment. The basis for the determination is that these 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 3rd day of September 1982.

Respectfully submitted,

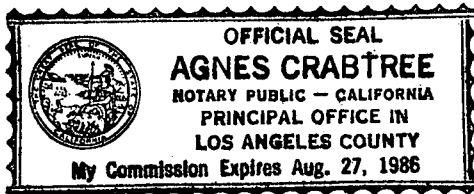
SOUTHERN CALIFORNIA EDISON COMPANY

By Robert Ditch

Subscribed and sworn to before me this
3rd day of September 1982.

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

My Commission Expires: Aug 27, 1986



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

By Charles R Kocher

SAN DIEGO GAS & ELECTRIC COMPANY

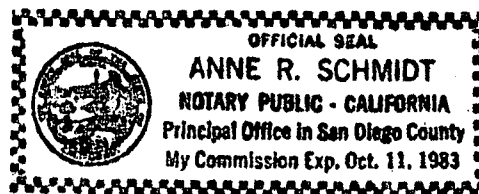
By *G.D. Cotton*
G.D. Cotton

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

By *David R. Pigott*

Subscribed and sworn to before me
this 1 day of September 1982.

Anne R. Schmidt
Notary Public in and for the City
and County of San Diego, California



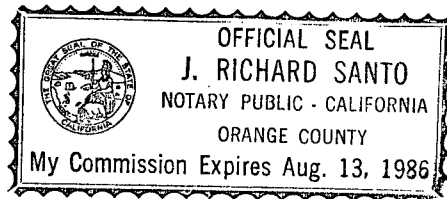
THE CITY OF ANAHEIM

By Dale L Pohlman

Dale L. Pohlman

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

By Alan R. Watts



200 S. ANAHEIM BLVD, ANAHEIM, CA 92603

Subscribed and sworn to before me
this 31 day of AUGUST, 1982.

J. Richard Santo
Notary Public in and for the County
of ORANGE, State of California

THE CITY OF RIVERSIDE

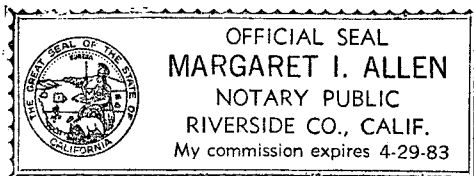
By *Everett C. Ross*

Everett C. Ross

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

By *Alan R. Watts*

Subscribed and sworn to before me
this 2nd day of September, 1982.



Margaret I. Allen
Notary Public in and for the County
of Riverside, State of California

DESCRIPTION OF PROPOSED CHANGE NPF-10-9 AND SAFETY ANALYSIS
AMMENDMENT APPLICATION NO. 11 OPERATING LICENSE NPF-10

This is a request to revise Appendix "A" Technical Specification 4.4.5.2.2.c and 4.4.5.2.2.d.

REACTOR COOLANT SYSTEM OPERATIONAL LEAKAGE

Existing Specification

- c. Prior to returning the valve to service following maintenance, repair or replacement work on the valve.
- d. Within 24 hours following valve actuation due to automatic or manual action or flow through the valve (for valves in Section B of Table 3.4-1).

Proposed Specification

- c. Prior to declaring valve operable following maintenance, repair or replacement work on the valve.
- d. For valves in Section B of Table 3.4-1, within 48 hours after each time the following conditions are satisfied:
 - 1. RCS pressure is greater than 600 psig, and
 - 2. The valve has actuated due to flow through the valve. (Except as a result of SI header drain valve operation.)

Reason for Proposed Change

The change to paragraph 4.4.5.2.2.c is editorial only since the valve must be "returned to service" in order to perform the leak check.

As written, Technical Specification 4.4.5.2.2.d requires testing valves in Section B of Table 3.4-1 within 24 hours following valve actuation and/or flow through the valve. However, the procedure developed to leak check the valves of Table 3.4-1, Section B requires very nearly 24 hours to perform and then, only if proper plant conditions can be established with no problem. Thus, an additional 24 hours tolerance for performance of the leak check is requested.

Further, the potential for intersystem LOCA does not exist until and unless RCS pressure exceeds the lesser of SDCS (LPSI) or SIT design pressure (i.e., 600 psig).

Lastly, the only means of actuating the valves in Section B of Table 3.4-1 (all check valves) is via flow through the valve. Moreover, any procedure developed to leak test these valves will require the SI header drain valve to be opened to restore SI header pressure to normal; each time the SI header

drain valve is opened, the SIT check valve will be moved slightly off its seat, which would require retesting of the SIT check valve in an endless loop. To preclude this situation, valve actuation due to SI header drain valve operation must be excepted.

Safety Analysis

The proposed change will permit sufficient time for performing an accurate leak rate check on the valves of Table 3.4-1, Section B while limiting the length of time of possible overpressurization of low pressure piping due to check valve leakage.

Low pressure piping overpressurization due to check valve leakage is further minimized by monitoring the pressure in the normally stagnant section of each injection header between the SIT and the RCS. This section of piping is designed for 2485 psig but pressure transmitters PT-0319, 0329, 0339, and 0349 are set to alarm at 1000 psig in the control room. Further intersystem leakage via this flow path is discussed in section 5.2.5.1.11 of the FSAR.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-9 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 Environmental Statement.

JHMartin:4543

DESCRIPTION OF PROPOSED CHANGE NPF-10-15 AND SAFETY ANALYSIS
AMENDMENT APPLICATION NO. 11 OPERATING LICENSE NPF-10

This is a request to revise Appendix "A" Technical Specification 3.4.1.4.1.

REACTOR COOLANT SYSTEM

COLD SHUTDOWN - LOOPS FILLED

Existing Specification

See Attachment "A"

Proposed Specification

See Attachment "B"

Reason For Proposed Change

This proposed change will allow removal of both shutdown cooling trains from service while in MODE 5, as long as one reactor coolant pump is in operation and both reactor coolant loops are operable.

We recognize that this proposed change is a deviation from the C-E Standardized Technical Specifications Revision 3 (although similar to C-E STS R2) but we feel that this deviation is warranted because this clause will:

1. Allow maintenance on common portions of the shutdown cooling system such as the flow orifice. At this time we are required to heat up to above 200°F prior to removing the SDCS system from service.
2. Allow alignment of the Emergency Core Cooling Systems (HPSI, LPSI, CSS) in parallel with plant heatup to facilitate (a) flushing low boron concentration reactor coolant out of the safety injection and spray piping shared with shutdown cooling, (b) filling of the Safety Injection Tanks (SIT) such that they can be pressurized prior to heatup and (c) thus operate the system in accordance with FSAR section 6.3.2.9.6. With the existing specification, the SIT's remain depressurized until after: (1) entry into Mode 4, (2) system realignment, and (3) flush completion. Then the SIT's can be filled with the proper boron concentration, and finally the SIT's can be pressurized to 360 psig. It takes approximately 4 hours to align the system for flush, 2 hours to complete the flush, 4 hours to fill a drained SIT, 2 hours to pressurize SIT's and obtain boron analysis, or approximately 12 hours. This potentially delays heatup by approximately 6 hours. Utilization of the HPSI pumps to fill the SIT's with the LTOP in service is not desired because of the potential for over pressurization of the RCS. (If the HPSI pumps are used, the HPSI header pressure must be maintained at less than RCS pressure by manually throttling the discharge manual valve using radio communication to coordinate the activity.)

3. Allow greater operational flexibility and there is the potential for synchronizing the generator to the grid approximately six hours sooner thereby increasing unit availability.

Safety Analysis:

The proposed Technical Specification is very similar to the arrangement in MODE 4 (Specification 3.4.1.3). The major differences between plant conditions in MODE 4 and MODE 5 (loops filled) are: temperature, pressure, and required SHUTDOWN MARGIN. These differences have been reviewed with respect to the proposed specification and no safety issues have been identified.

The ability to cool the reactor is not compromised, in fact the diversity of cooling sources is increased by allowing normal use of the Reactor Coolant Pumps.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-15 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.

LP:4185