### 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. 12

SOUTHERN CALIFORNIA EDISON COMPANY, <u>ET AL</u>. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 12.

This amendment consists of Proposed Change NPF-10-42 to Facility Operating License No. NPF-10. Proposed Change NPF-10-42 is a request to revise Section 2.C.(19)i of Operating License NPF-10 and to revise Appendix A Technical Specification 6.8.4.d. The proposed change seeks to defer the implementation dates of the post accident sampling system.

Pursuant to 10 CFR 170.22, Proposed Change NPF-10-42 contained in Amendment Application No. 12 is considered to constitute a Class III Amendment. The basis for the determination is that this change involves safety considerations.

Accordingly, the fee of \$4,000.00 corresponding to this determination is remitted herewith as required by 10 CFR 170.22.

8209210337 820917 PDR ADDCK 05000361 PDR Subscribed on this 17th day of September 1982.

Respectfully submitted,
SOUTHERN CALIFORNIA EDISON COMPANY

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Robert Dietch

Subscribed and sworn to before me this

17th day of September 1982.

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

My Commission Expires: Jug. 27, 1986



OFFICIAL SEAL

AGNES CRABTREE

NOTARY PUBLIC — CALIFORNIA PRINCIPAL OFFICE IN LOS ANGELES COUNTY

My Commission Expires Aug. 27, 1986

Subscribed on this 14th day of September 1982

Respectfully submitted,

SAN DIEGO GAS & ELECTRIC COMPANY

Ву

G.D. Cotton

Subscribed and sworn to before me this

14 day of heatenhan 1982.

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



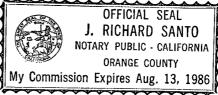
#### THE CITY OF ANAHEIM

By Dale & Pohlman

Dale L. Pohlman

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

By Clan R. Walts



200 S. ANAHEIM BLVD. ANAHEIM, CA 92803

Subscribed and sworn to before me this 14 day of SEPT, 1982.

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

#### THE CITY OF RIVERSIDE

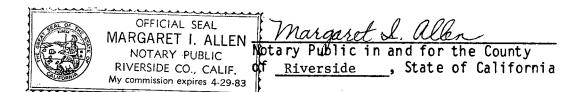
Ву

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 <u>15th</u> day of <u>September</u>, 1982.



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# DESCRIPTION OF PROPOSED CHANGE NPF-10-42 AND SAFETY ANALYSIS OPERATING LICENSE NPF-10

This is a request to revise Section 2.C.(19)i of Facility Operating License NPF-10 and to revise Technical Specification 6.8.4.d.

# Existing Condition and Technical Specification

Section 2.C.(19)i Post-Accident Sampling (II.B.3, SSER No.1, SSER No. 4, Section 1-12, SSER No. 5)

Prior to exceeding five (5) percent power, the post-accident sampling system shall be operable and the post-accident sampling program shall be fully implemented.

# Technical Specification 6.8.4.d Post-Accident Sampling

A program\* which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program\* shall include the training of personnel, the procedures for sampling and analysis and the provisions for maintenance of sampling and analysis equipment.

\* Not required to be implemented prior to first exceeding 5% RATED THERMAL POWER.

## Proposed Changes

Section 2.C(19)i Post Accident Sampling (II.B.3, SSER No. 1, SSER No. 4, Section 1-12, SSER No. 5)

The post-accident sampling system shall be operable and the post-accident sampling program shall be fully implemented by January 1, 1983.

# Technical Specification 6.8.4.d Post-Accident Sampling

A program\* which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program\* shall include the training of personnel, the procedures for sampling and analysis and the provisions for maintenance of sampling and analysis equipment.

\* Not required to be implemented prior to January 1, 1983.

## Reason for Proposed Changes

SCE is seeking to defer the implementation date of the post-accident sampling program for the following reasons:

 During final acceptance testing of the post-accident sampling system(PASS) using actual reactor coolant sample, with the reactor operating at low power, numerous hardware problems

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were encountered which precluded SCE from obtaining certain required analyses. Additionally, repeatability of results could not be demonstrated for some analyses. These deficiencies were not experienced during preoperational testing. Hardware modifications to correct the deficiencies encountered require a material delivery lead time of from one to two months. After the hardware modifications are completed additional time is needed to train station personnel on the modified system to insure reliable and repeatable sampling capability.

- 2. Alternate means are available to sample reactor coolant and containment atmosphere. The sampling system used during normal operation is available and is working properly. Samples are being taken as required by Technical Specifications. The high range containment radiation monitor, the containment hydrogen monitor, and the containment purge wide range radiation monitor are available and do provide additional information regarding post-accident conditions.
- 3. SCE was one of the first utilities to order and install a PASS. This was done on an accelerated engineering schedule for a system with no previous operating history.

## Safety Analysis

The proposed change delays the implementation dates of the PASS. The proposed change will significantly reduce exposure to operating and construction personnel during the implementation period for the subject modification.

The unavailability of the PASS will not present a significant loss of information necessary to assess containment and reactor conditions should a major accident occur during the period in question. Alternate containment monitoring equipment as described above is installed and operable. In addition, off-site post-accident sampling equipment developed since TMI could be contracted for and utilized if the need arose. Further the PASS performs no direct safety system.

Accordingly, it is concluded that: (1) Proposed Change NPF-1G-42 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.