

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 15th day of October, 1982.



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

DESCRIPTION OF PROPOSED CHANGE NPF-10-17 AND
SAFETY ANALYSIS, OPERATING LICENSE NPF-10

This is a request to revise Appendix A, Technical Specification 3.3.2, Table 3.3-5 Item 6.a(2).

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

Existing Specification

6. Refueling Water Storage Tank - Low

a. RAS

- | | |
|----------------------------------|-------|
| (1) Containment Sump Valves Open | 50.7* |
| (2) ECCS Miniflow Valves Shut | 40.7* |

Proposed Specification

Change response time for ECCS Miniflow Valves Shut from 40.7* seconds to 50.7* seconds.

Reason for Proposed Change

The current 40.7 second response time limit for miniflow isolation on a Recirculation Actuation Signal (RAS) is too restrictive. Excluding the 10 second allowance for emergency diesel generator starting and loading delay, only 30.7 seconds is permitted for response of the RAS instrumentation and logic and the miniflow isolation valve stroke time. The valves will stroke in less than 40 seconds, but may not consistently meet the 30 second requirement.

Safety Analysis

The emergency core cooling system (ECCS) response to Loss of Coolant Accidents includes injection of water from the refueling water storage tanks to the reactor coolant system. On low level in the refueling water storage tanks, the ECCS changes from the injection mode to the recirculation mode. Coincident with this transfer of ECCS suction to the containment emergency sump, the ECCS miniflow isolation valves shut to prevent transport of radioactive sump water back to the refueling water storage tanks. In the worst case, assuming the proposed change, with all pumps (HPSI, LPSI, CSS) at maximum flow and single failure of a LPSI pump to trip on RAS, 45 gallons of water from the containment sump will pass the miniflow isolation valves and stop 36 feet downstream. This quantity of water will not result in radiological consequences because it is contained inside a shielded pipe tunnel and upstream of a loop seal. The loop seal starts at a point 63 feet downstream of the miniflow valves and the shielded area extends at least 77 feet beyond the loop seal. The miniflow valves would have to remain open an additional 13 seconds for a total of 53 seconds before the sump water would extend to the start of the loop seal. This is significantly greater than the 40 second response time requested.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-17 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.

DESCRIPTION OF PROPOSED CHANGE NPF-10-43 AND SAFETY ANALYSIS
AMENDMENT APPLICATION NO. OPERATING LICENSE NPF-10

This is a request to revise Appendix "A" Technical Specification 6.8.2 and 6.8.3.

Existing Specifications

See Attachment A

Proposed Specifications

6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be approved by the Station Manager; or by (1) the Manager, Operations, (2) the Manager, Technical, (3) the Manager, Maintenance, (4) the Deputy Station Manager, (5) the Manager, Health Physics, (6) the Manager, Station Security, (7) the Manager, Station Emergency Preparedness, (8) the Manager, Material and Administrative Services, or (9) the Manager, Configuration Control and Compliance, as previously designated by the Station Manager; prior to implementation and shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed and approved by the Station Manager; or by (1) the Deputy Station Manager, (2) the Manager, Operations, (3) the Manager, Maintenance, (4) the Manager, Technical, (5) the Manager, Health Physics, (6) the Manager, Station Security, (7) the Manager, Station Emergency Preparedness, (8) the Manager, Material and Administrative Services, or (9) the Manager, Configuration Control and Compliance, as previously designated by the Station Manager; within 14 days of implementation.

Reason for Proposed Change

As presently written, the Station Manager may designate the appropriate functional managers to review and approve procedures in their respective areas of responsibility. In order to establish consistent requirements for review and approval in all Station Departments, the Managers of Station Security, Emergency Preparedness, Material and Administrative Services, and Configuration Control and Compliance should be included in specifications 6.8.2 and 6.8.3.

Safety Analysis

The proposed change authorizes functional managers of the Station staff to review and approve Station procedures and changes thereto that govern activities in their respective areas of responsibility. These managers are qualified, by virtue of their education, experience, and training to

provide this function. The Station Manager retains overall responsibility for procedures as required by 6.5.2.1. Accordingly, it is concluded that: (1) Proposed Change NPF-10-43 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.

NPF-10-43

ATTACHMENT A

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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54

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 AUTH. NAME AUTHOR AFFILIATION
 MEDFORD, M. O. Southern California Edison Co.
 RECIP. NAME RECIPIENT AFFILIATION
 KNIGHTON, G. W. Licensing Branch 3

SUBJECT: Forwards Affidavit of Svc for Amend Application 13 to License NPF-10.

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	NRR/DSI/CPB 10		1	1		NRR/DSI/CSB 09	1	1	
	NRR/DSI/ETSB 12		1	1		NRR/DSI/ICSB 16	1	1	
	NRR/DSI/PSB 19		1	1		NRR/DSI/RAB 22	1	1	
	NRR/DSI/RSB 23		1	1		NRR/DST/LGB 33	1	1	
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Southern California Edison Company



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October 28, 1982

Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, 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

SCE's letter of October 21, 1982 submitted Amendment Application No. 13 to Facility Operating License NPF-10 for San Onofre Nuclear Generating Station, Unit 2. The letter stated that direct distribution of the amendment application would be made in accordance with service list provided in SCE's letter of August 2, 1982 to the Commission. In addition, SCE stated that an affidavit would be provided affirming that the distribution had been made.

Enclosed is an affidavit attesting to the fact that direct distribution of Amendment Application No. 13 has been completed in accordance with the enclosed service list.

Very truly yours,

M. O. Medford

Enclosures

cc: Harry Rood, Project Manager
Licensing Branch 3

Boo!

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of SOUTHERN)
CALIFORNIA EDISON COMPANY, ET AL.) Docket No. 50-361
(San Onofre Nuclear Generating) Amendment Application
Station Unit No. 2) No. 13

AFFIDAVIT OF SERVICE

I, GERARD VAN NOORDENNEN, hereby declare that a copy of Amendment Application No. 13 to Facility Operating License No. NPF-10, was served on the following by deposit in the United States Mail, postage prepaid, on the 28th day of October, 1982. addressed as follows:

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U.S. Nuclear Regulatory Commission
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Dated on this 28th day of October, 1982 in the County of
Los Angeles at Rosemead, California.

Gerard van Noordennen
Gerard van Noordennen
Nuclear Licensing Engineer
SOUTHERN CALIFORNIA EDISON COMPANY
2244 Walnut Grove Avenue
Rosemead, California

Subscribed and sworn to before me
this 28th day of October, 1982

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

