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. 15

SOUTHERN CALIFORNIA EDISON COMPANY, <u>ET AL</u>. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 15.

This amendment consists of Proposed Changes NPF-10-36 and NPF-10-51 to Facility Operating License No. NPF-10. Proposed Change NPF-10-36 is a request to revise Technical Specifications 3.3.2 (Table 3.3-5) and 4.7.1.2.1.a. The proposed change increases engineered safety feature response time limits for auxiliary feedwater delivery and identifies other identical response time requirements. Proposed change NPF-10-51 contains verious editorial and typographical changes to minimize differences between the Unit 2 and Unit 3 Technical Specifications.

Pursuant to 10 CFR 170.22, the proposed changes contained in Amendment Application No. 15 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 corresponding to this determination is remitted herewith as required by 10 CFR 170.22.

Subscribed on this Let day of Alexander 1982

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By Robert Dietek

Subscribed and sworn to before me this

1st day of Slecember 1982.

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

My Commission Expires: lug 27, 1986

OFFICIAL SEAL
AGNES CRABTREE
MOTARY PUBLIC — CALIFORNIA
PRINCIPAL OFFICE IN
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My Commission Expires Aug. 27, 1986

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

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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

Subscribed and sworn to before me this

24 day of November 1985.

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

OFFICIAL SEAL OFFICIAL SEAL
ANNE R. SCHMIDT
NOTARY PUBLIC - CALIFORNIA
Principal Office in San Diego County
My Commission Exp. Oct. 11, 1983

THE CITY OF ANAHEIM

By Soudon W. Horr

Gordon W. Hoyt

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

By Clan R. Watts

Subscribed and sworn to before me this 22 day of NoV, 1982.

OFFICIAL SEAL
ROLAND B SHARPLESS
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200 S. Anaheim Blvd., Anaheim, CA 92805

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THE CITY OF RIVERSIDE

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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 23rd day of November, 1982.

Margastl J. allen
Notary Public in and for the County
of Riverside , State of California



DESCRIPTION OF PROPOSED CHANGE NPF-10-36 AND SAFETY ANALYSIS AMENDMENT APPLICATION NO.15, OPERATING LICENSE NPF-10

This is a request to revise Appendix "A" Technical Specification 3.3.2 (Table 3.3-5) and 4.7.1.2.1.a.

Existing Specifications

See Attachment A

Proposed Specification

- A. Specification 3.3.2 (Table 3.3-5) ENGINEERED SAFETY FEATURES RESPONSE TIMES
 - 1. Item 2.a(1):
 - (1) Safety Injection
 - (a) High Pressure Safety Injection
 (b) Low Pressure Safety Injection
 (c) Charging Pumps
 31.2*
 31.2*

<u>REASON FOR PROPOSED CHANGE:</u> Charging flow is required on pressurizer pressure-low (only) to augment HPSI flow for small break LOCA (hence, the identical response time requirement).

- 2. Item 3.b:
 - b. CIAS
 - (1) Containment Isolation 10.9* (NOTE 2)
 (2) Main Feedwater Backup Isolation 10.9 (HV1105, HV1106, HV4047, HV4051)

REASON FOR PROPOSED CHANGE: Main feedwater backup isolation valves are required to isolate main feedwater in the event of a main steam or feedline break inside containment with concurrent single failure of a MFWIV (with the identical response time requirement to MFWIV's).

- 3. Item 5:
 - a. MSIS

| (1) | Main Steam Isolation (HV8204, HV8205) | 5.9 |
|-----|--|------|
| (2) | Main Feedwater Isolation (HV4048, HV4052) | 10.9 |
| (3) | Steam, Blowdown, Sample and Drain Isolation | 20.9 |
| | (HV8200, HV8419, HV4054, HV4058, HV8203, HV8248) | |
| | (HV8201, HV8421, HV4053, HV4057, HV8202, HV8249) | • |
| (4) | Auxiliary Feedwater Isolation | 40.9 |
| | (HV4705, HV4713, HV4730, HV4731) | |
| • | (HV4706, HV4712, HV4714, HV4715) | |

REASON: To clarify isolation time requirements for the various MSIS-actuated valves and correct MSIV response time.

- 4. Items 8 and 9
 - a. EFAS
 - (1) Auxiliary Feedwater (AC trains)

52.7*/42.7**

(2) Auxiliary Feedwater (Steam/DC train)

42.7 (NOTE 6)

REASON FOR PROPOSED CHANGE: To increase response time requirements up to the analyzed limits for AFW delivery (42.7 seconds for non-LOCA events [bounded by the loss of normal feedwater event] and 52.7 seconds for events which require AFW with SIAS present [bounded by the (coincident) loss of normal A/C event (53 seconds vs. the requested 52.7)]).

- B. <u>Specification 4.7.1.2.1.a</u>, AUXILIARY FEEDWATER SYSTEM, add new surveillance requirement
 - 4. Verifying that the AFW piping is full of water by venting the accessible discharge piping high points.

REASON FOR PROPOSED CHANGE: This change is required to support changes to Table 3.3-5 items 8 and 9. Changes to Table 3.3-5 items 8 and 9 are based on analysis limits which are for AFW delivery versus pump start/valve stroke time. Lines are long enough that system transport time could result in unacceptable delivery time, if less than completely filled, even though pumps and valves meet the item 8 and 9 changed requirements.

Safety Analysis

The proposed changes restrict the response time of active system components and require that system remained filled to eliminate fluid transport time in order to ensure that overall Auxiliary Feedwater System response time is within the limits of existing safety analyses. Accordingly, it is concluded that: (1) Proposed Change NPF-10-36 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.

GPvN: 1432A