

BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON )  
COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY )  
for a Class 104(b) License to Acquire, ) DOCKET NO. 50-206  
Possess, and Use a Utilization Facility as )  
Part of Unit No. 1 of the San Onofre Nuclear ) Amendment Application No. 120  
Generating Station )

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC  
COMPANY, pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 120.

This amendment application consists of Proposed Change Nos. 135 and  
136 to the Technical Specifications incorporated in Provisional Operating  
License No. DPR-13 as Appendices A and B.

Proposed Change No. 135 is a request to revise Appendix A Technical  
Specification 3.3, "Safety Injection and Containment Spray Systems." This  
proposed change provides the requirements for utilizing the Auxiliary  
Saltwater Cooling Pump and the Screen Wash Pumps as backup to the Saltwater  
Cooling Pumps. Proposed Change No. 135 is a revision to and supersedes  
Proposed Change No. 98 which was submitted to the NRC as Amendment Application  
No. 92 by letter dated August 27, 1980.

Proposed Change No. 136 is a request to revise Appendix A Technical  
Specifications 3.14, "Fire Protection Systems," and 4.15, "Fire Protection  
Systems Surveillance," to include the newly installed Fire Protection systems  
as required by the NRC. General format and content revisions have been made  
to conform to the extent practical, with the Standard Technical Specifications

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and the San Onofre Units 2 and 3 Technical Specifications. Proposed Change No. 136 is a revision to and supersedes Proposed Change No. 92 which was submitted to the NRC as Amendment Application No. 90 by letter dated April 4, 1980.

In the event of conflict, the information in Amendment Application No. 120 supersedes the information previously submitted.

Since both Proposed Change Nos. 135 and 136 are revisions to previously submitted changes which were transmitted with the required fee in accordance with 10 CFR 170.22, it has been determined that no additional fee is required.

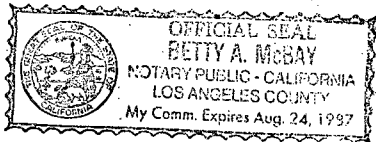
Subscribed on this 8<sup>th</sup> day of June, 1984

Respectfully submitted,  
SOUTHERN CALIFORNIA EDISON COMPANY

By *Charles B. McCarthy, Jr.*  
Charles B. McCarthy, Jr.

Subscribed and sworn to before me this  
8<sup>th</sup> day of June 1984.

*Betty A. McBay*  
Notary Public in and for the County of  
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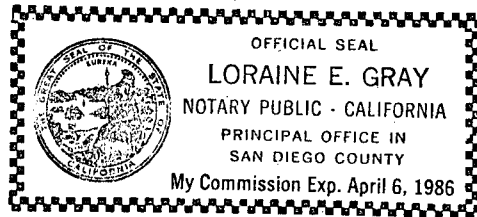
Subscribed on this 6<sup>th</sup> day of June 1984.

Respectfully submitted,  
SAN DIEGO GAS & ELECTRIC COMPANY

By J. C. Holcombe  
J. C. Holcombe

Subscribed and sworn to before me this  
6<sup>th</sup> day of June 1984.

Lorraine E. Gray  
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of SOUTHERN )  
CALIFORNIA EDISON COMPANY )  
and SAN DIEGO GAS & ELECTRIC )  
COMPANY (San Onofre Nuclear )  
Generating Station Unit No. 1 )

Docket No. 50-206

CERTIFICATE OF SERVICE

I hereby certify that a copy of Amendment No. 120 was served on the following  
by deposit in the United States Mail, postage prepaid, on the 8<sup>th</sup> day  
of June, 1984.

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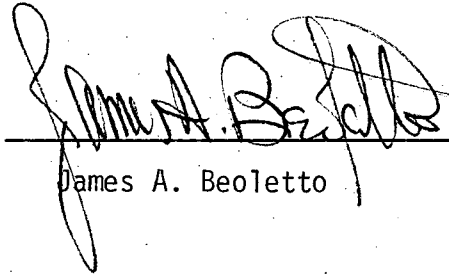
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James A. Beoletto

## DESCRIPTION OF PROPOSED CHANGE NO. 135 AND SAFETY ANALYSIS

This is a request to revise Section 3.3, "Safety Injection and Containment Spray Systems," of Appendix A Technical Specifications for San Onofre Nuclear Generating Station Unit 1.

### DESCRIPTION

As a result of the failure of the Saltwater Cooling System on March 10, 1980, the NRC Regional Office provided SCE with a Technical Specification interpretation of the Salt Water Cooling System by letter dated April 4, 1980. In response to that interpretation SCE submitted Proposed Change No. 98 to the NRC by letter dated August 27, 1980 complying with the region direction. The proposed change eliminated the use of the Auxilliary Saltwater Cooling Pump in determining the operability of the Saltwater Cooling System.

Following NRC staff review of the proposed change, a safety evaluation was provided to SCE by letter dated October 28, 1983. The NRC staff rejected the proposed change on the basis that the Auxilliary Saltwater Cooling Pump provides additional reliability to the existing system. The SER also indicated that consideration should also be given to the use of the Screen Wash Pumps as a backup to the Saltwater Cooling System.

The NRC staff recommended that the proposed change be revised to address the Auxilliary Saltwater Cooling Pump and the Screen Wash Pumps as backup pumps. The proposed change should also include:

1. a time limit for operation in Modes 1-4 with the backup pumps should the salt water pump become inoperable,
2. an action statement if the time limit is exceeded and
3. appropriate testing of the backup pumps.

Therefore, this proposed change is in response to the NRC's October 28, 1983 letter and SER regarding the Auxilliary Saltwater Cooling Pump.

The revised Technical Specifications utilize a 72 hour time period for operation with the backup pumps. It is considered there is a low probability that an earthquake would occur which would make the backup pump inoperable, and a single failure which would make the second saltwater cooling pump inoperable during the 72 hour time period. The revised Technical Specification includes a statement to be in Hot Standby within 6 hours and Cold Shutdown within 30 hours if the 72 hour time period is exceeded. These time limits are based on the Westinghouse Standard Technical Specification (NUREG-0452, Rev. 4) for Service Water Systems. The revised Technical Specification also includes a requirement for testing the backup pump during the 72 hour time period.

### EXISTING TECHNICAL SPECIFICATIONS

The affected technical specifications presently read as follows:

- 3.3.1.A.(1)h: Two saltwater cooling pumps are operable, or one saltwater cooling pump and the auxiliary saltwater cooling pump are operable.
- 3.3.1.B.(6): One of the two required saltwater cooling pumps or auxiliary saltwater cooling pump for a period of time not longer than 72 consecutive hours.

### PROPOSED TECHNICAL SPECIFICATIONS

Technical Specifications 3.3.1.A(1) h and 3.3.1.B(6) will be revised as follows:

- 3.3.1.A.(1)h: Two saltwater cooling pumps are operable. The reactor may be maintained critical with one saltwater cooling pump provided the auxiliary saltwater cooling pump or (2) screen wash pumps are available as backup. Return the inoperable pump to operable status within 72 hours or be in Hot Standby within the next 6 hours and in Cold Shutdown within the next 30 hours. The backup pump(s) shall be demonstrated operable by test within 1 hour of declaring the saltwater cooling pump inoperable.
- 3.3.1.B(6): One of the two saltwater cooling pumps with the auxiliary saltwater cooling pump or the screen wash pumps available as backup for for a period of time not longer than 72 consecutive hours. The backup pump(s) shall be demonstrated operable by test within 1 hour of declaring the saltwater pump inoperable.

### SAFETY ANALYSIS

The proposed change discussed above is deemed not to constitute a significant hazards consideration based on the fact the proposed change involves additional limitations, restrictions and requirements not included in the existing Technical Specifications. Further discussion regarding this position is provided below:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

All design basis event analysis performed requiring the Saltwater Cooling System has been done utilizing one saltwater cooling pump. This proposed change ensures that at least one saltwater cooling pump and a backup pump (i.e. the auxiliary saltwater cooling pump or screen wash pumps) will be available at all times during reactor operation. Therefore operation of the facility in accordance with this proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.



2. Will operation of the facility in accordance with this proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Reponse: No

All analysis performed requiring the Saltwater Cooling System has been done utilizing one saltwater cooling pump. This proposed amendment assures that one saltwater cooling pump with a backup pump will be available during reactor operation. Therefore operation of the facility in accordance with this amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Will operation of the facility in accordance with this proposed amendment involve a significant reduction in a margin of safety?

Response: No

The facility will operate at all times in accordance with its design basis. The reliability of the Saltwater Cooling System will be increased by use of the Auxilliary Saltwater Cooling pump and the Screen Wash pumps as backup pumps. Therefore operation of the facility in accordance with this proposed amendment does not involve a significant reduction in a margin of safety.

#### SAFETY AND SIGNIFICANT HAZARDS DETERMINATION

Based on the Safety Evaluation, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; (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 Environmental Statement.

DESCRIPTION OF PROPOSED CHANGE AND SAFETY ANALYSIS  
PROPOSED CHANGE NO. 136 TO THE TECHNICAL SPECIFICATIONS  
PROVISIONAL OPERATING LICENSE DPR-13

This is a request to revise Sections 3.14, "Fire Protection Systems," and 4.15, "Fire Protection Systems Surveillance," of Appendix A Technical Specifications for San Onofre Nuclear Generating Station Unit 1.

Description

This proposed change is intended as a general revision of the Technical Specifications for the Fire Protection Systems to incorporate to the extent practical, Standard Technical Specification format and to add newly installed Fire Protection Systems to the Technical Specifications. In addition, some substantive changes have been made to the existing Technical Specifications to more closely conform with the Standard Technical Specification requirements and the San Onofre Units 2 and 3 Technical Specifications as applicable.

By letter dated April 4, 1980 application for Amendment No. 90 to the San Onofre Unit 1 Operating License was submitted requesting changes to the Technical Specifications. Amendment No. 90 included Proposed Change No. 92 to the Technical Specifications which was a request to modify the Fire Protection operability and surveillance requirements to incorporate the equipment installation accomplished during the refueling outage for Cycle 8 operation. Since that time additional equipment has been installed and the NRC staff has informally requested changes to the Technical Specifications of Proposed Change No. 92. It was decided that the best way to incorporate all new equipment and to resolve NRC staff concerns associated with Proposed Change No. 92 was to resubmit a new proposed change which modeled to the extent practical the format and content of the Standard Technical Specifications. In addition, since Fire Protection is to a large extent a site-wide function, changes have been made, where applicable, to conform with the requirements of the San Onofre Units 2 and 3 Technical Specifications. These changes include the revisions described in Proposed Change NPF-10-146 of Amendment Application 25 for Unit 2 and Proposed Change NPF-15-146 of Amendment Application 11 for Unit 3. Both of these amendment applications were submitted on April 2, 1984. Accordingly, this new Proposed Change No. 136 has been developed to supersede Proposed Change No. 92.

Existing Specifications

The existing Technical Specifications 3.14 and 4.15 of Appendix A to Provisional Operating License No. DPR-13 are provided in Enclosure 1.

Proposed Specifications

Technical Specifications 3.14 and 4.15 would be revised to read as indicated in Enclosure 2.

Reasons for Proposed Change

Several important aspects of the Fire Protection Program at San Onofre Unit 1 have been upgraded or revised since the incorporation of the existing fire protection Technical Specifications. These changes have resulted in a need to revise the applicable fire protection Technical Specifications. Certain aspects of the Fire Protection Program have general applicability to all of the changes which are being requested and these aspects are discussed below:

- 1) Fire alarms annunciate in the Control Room and are acknowledged by Operations personnel. Operations personnel investigate fire alarms, notify the fire brigade of valid fire annunciation, and initiate compensating action for impaired fire protection measures. The areas with OPERABLE fire detection are therefore monitored continuously and a continuous fire watch is not needed to detect a fire and notify the fire brigade when automatic suppression systems within the area are declared inoperable.
- 2) The 5-man fire brigade provides coverage on a 24-hour basis. This brigade consists solely of State Certified fire fighters/emergency medical technicians. The brigade is trained in fighting the types of fires encountered in nuclear power plants. The brigade is required to drill quarterly, however, currently they drill weekly to ensure readiness and maintain effectiveness. The brigade has 2 fully equipped fire trucks. The members of the fire brigade bring their own equipment to the scene and are knowledgeable in the location of fire fighting equipment provided throughout the plant. Therefore, backup fire suppression equipment is provided by the brigade responding to the fire.
- 3) An OPERABLE automatic suppression system in a fire area will ensure that a fire is promptly extinguished if the detection system in the area is inoperable. For areas without automatic suppression and without detection, either an hourly or continuous fire watch is implemented.
- 4) An hourly fire watch is acceptable for areas where a fire will not affect redundant safe shutdown systems since complete loss of function of these systems will not prevent safe shutdown.
- 5) Implementation of fire watches and surveillance of fire protection equipment has caused station personnel to be unnecessarily exposed to radiation. The addition of the words "accessible during plant operation" will provide station management the prerogative to establish priority of radiation and/or other life-threatening safety hazards over fire hazards.
- 6) The requirements for special reports have been deleted from the ACTION requirements of the Technical Specifications. Reporting will be done through the LER process in accordance with the requirements of 10 CFR 50.73.

The following discussion provides the reason for each change as proposed by this request.

- 3.14.I The requirement for the operability of 3 of the 5 pumps available at the San Onofre Site completes the implementation of the requirements of the Safety Evaluation Report of Reference 2 (and Staff Position 2) for redundant sources of water, multiple feeds to the yard loop and minimum flow requirements. The special reporting requirements are deleted as discussed above in general reason 6.
- 3.14.II The operability requirements for the spray and/or sprinkler systems are modified to indicate that these systems are only required to be OPERABLE when the equipment protected by these systems is required to be OPERABLE. The listing of systems in Table 3.14.1 is changed from the existing listing to be more descriptive and to add the systems installed subsequent to the issuance of the existing list. The ACTION requirements are revised to provide for different compensating measures if the systems are inside containment. Outside containment, an additional differentiation is made for areas where redundant safe shutdown systems could be damaged. The reasons for these changes are those specified above as general reasons 1-6. The special reporting requirements are deleted as discussed above in general reason 6.
- 3.14.III A Technical Specification for the foam suppression system is added to ensure the operability of this system. The ACTION statements were added consistent with those of 3.14.II for systems outside containment in areas with redundant safe shutdown systems.
- 3.14.IV A Technical Specification for the Halon suppression systems is added to ensure the operability of these systems. The ACTION statements were added consistent with those of 3.14.II for systems outside containment in areas with redundant safe shutdown systems and to the extent practical, consistent with the Standard Technical Specifications.
- 3.14.V The operability requirements for the fire hose stations are modified to indicate that these stations are only required to be OPERABLE when the equipment protected by these systems is required to be OPERABLE. The listing of required fire hose stations in Table 3.14.2 is revised to be more descriptive and to include any hose stations added subsequent to the issuance of the existing list. The definition of backup fire suppression is provided consistent with the enhanced response capabilities of the fire brigade as discussed above in general reason 2.

3.14.VI The operability requirements for the fire detection instrumentation are modified to indicate that these instruments are only required to be OPERABLE when the equipment protected by these systems is required to be OPERABLE. The listing of required fire detectors in Table 3.14.3 is revised to be more descriptive and to include the new detectors added after issuance of the existing list. The ACTION requirements are revised to provide for different compensatory measures if the systems are inside containment. Outside containment, an additional differentiation is made for areas where redundant safe shutdown systems could be damaged. The reasons for these changes are those specified above as general reasons 1-6. In addition, the remote television camera is removed from the required monitoring devices when detectors inside containment are inoperable. The camera was unreliable as an indicator due to its high failure rate and small viewing area where no combustibles could be monitored.

3.14.VII A Technical Specification for fire rated assemblies is added to ensure the operability of these fire barriers. The ACTION statements were added consistent with the basis of general reasons 1-6, and to the extent practical, consistent with the Standard Technical Specifications.

4.15.I The fire suppression water system surveillance requirements are revised to be consistent to the extent practical with Standard Technical Specification format.

4.15.II The spray and/or sprinkler systems surveillance requirements are revised to be consistent to the extent practical with the Standard Technical Specifications and by the addition of different requirements for valve position verification of valves inside containment. The basis for this change is as specified in general reasons 1-6. The provision for a 1 week outage allows sufficient time to complete the inspection within the outage schedule.

4.15.III Surveillance requirements are added for the foam suppression system consistent with NFPA requirements and, to the extent practical, with the surveillance requirements for water spray systems.

4.15.IV Surveillance requirements are added for the Halon suppression system consistent to the extent practical with the Standard Technical Specifications.

4.15.V The fire hose station surveillance requirements are revised to be consistent to the extent practical with Standard Technical Specification format.

4.15.VI The fire detection instrumentation surveillance requirements are revised to be consistent with the accessibility requirement of general reason 5 and to more clearly define "available plant outages" for surveillance purposes.

4.15.VII A surveillance requirement for fire doors (as part of fire rated assemblies) is added consistent with general reasons 1-6 and to the extent practical, the Standard Technical Specifications. No NFPA 72D supervised fire doors exist at San Onofre Unit 1. Monthly inspections of the closed position of fire doors is required consistent with Item 4.9 of Reference 2.

4.15.VIII A surveillance requirement for fire rated assemblies (exclusive of fire doors) is added consistent with the Standard Technical Specifications.

### Safety Evaluation

The proposed changes discussed above shall be deemed to constitute a significant hazards consideration if there is a positive finding in any of the following areas.

1. Will operation of the facility in accordance with this proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

As discussed above, these changes add operability and surveillance requirements for equipment which has been installed to improve Fire Protection at San Onofre Unit 1. The prevention and mitigation improvements will reduce the probability and/or consequences of a fire. Where credit is taken in the ACTION statements for existing detection and/or alternative existing automatic suppression systems the degree of protection is not degraded due to the continued availability of automatic suppression and the enhanced response capabilities of the station fire brigade, therefore the probability and/or consequences of a fire are not significantly impacted. Where credit is taken in the ACTION statements for hourly fire watches in areas without redundant safe shutdown equipment, the probability and/or consequences of a fire are not significantly impacted because safe shutdown is not affected assuming loss of function of the equipment in the area.

2. Will operation of the facility in accordance with this proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The previously evaluated fires for the existing approved Fire Protection Program at San Onofre Unit 1 are specified in References 1 and 2. The added Fire Protection measures and required Technical Specifications were added for compliance with the Fire Hazards Analysis of References 1 and 2. These changes therefore do not create the possibility of a new or

different kind of accident from any previously evaluated. The changes to the compensating measures of the ACTION statements do not significantly impact the accident analyzed nor do they create the possibility of a new or different kind of accident from any previously evaluated due to the equivalent protection provided by existing automatic suppression systems, the enhanced capabilities of the station fire brigade, and the fact that the safe shutdown capability following a fire is not significantly affected.

3. Will operation of the facility in accordance with this proposed amendment involve a significant reduction in a margin of safety?

Response: No

For the reasons stated in response to questions 1 and 2 above, the margins of safety will not be significantly reduced during operation of the facility in accordance with this proposed amendment.

The proposed revisions can therefore be divided in two categories. Those changes which constitute additional limiting conditions for operation and surveillance requirements are similar to example (ii) of amendments not likely to involve a significant hazards consideration published in 48 FR 14864 dated April 6, 1983. Those changes which may in some may reduce a margin of safety, but where the change is clearly within acceptable criteria are similar to example (vi) of amendments not likely to involve significant hazards consideration published in the same notice identified above.

#### Safety and Significant Hazards Determination

Based on the Safety Evaluation, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; and (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 Environmental Statement.

#### References

1. Fire Protection Program Review, BTP APCS 9.5-1, San Onofre Nuclear Generating Station, Unit 1, dated March, 1977.
2. Fire Protection Safety Evaluation Report, By the Office of Nuclear Reactor Regulating U.S. Regulatory Commission, In the matter of Southern California Edison Company, San Onofre Nuclear Generating Station Unit 1, Docket No. 50-206 dated July 19, 1979.