## UNITED STATES OF AMERICA 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

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DOCKET NO. 50-361

Amendment Application No. 33

SOUTHERN CALIFORNIA EDISON COMPANY, <u>ET AL</u>. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 33.

This amendment application consists of the following proposed changes to Facility Operating License No. NPF-10:

- Proposed Change NPF-10-198 is a request to revise Technical Specification 3/4.5.2 "ECCS Sub-Systems, Tavg greater than or equal to 350<sup>0</sup> F." The proposed change would delete RWST Isolation Valve 10-068 from surveillance requirement 4.5.2.a. Currently, the position of this valve must be verified as locked open once every 12 hours. A design change will remove this valve from the system, therefore, the surveillance requirement will no longer be performed.
- 2. Proposed Change NPF-10-207 is a request to revise Technical Specifications 3/4.3.2 "ESFAS Instrumentation," 3/4.6.3 "Containment Isolation Valves," and 3/4.7.1.5 "Main Steam Isolation Valves." The proposed change would increase the MSIV response time from 5 to 8 seconds.

- 3. Proposed Change NPF-10-209 is a request to revise Technical Specification 3/4.9.6 "Refueling Machine." The proposed change would add limiting conditions for operation and surveillance requirements for the auxiliary hoist which is being added to the refueling machine. This proposed change was previously submitted by the Southern California Edison Company's (SCE) letter dated December 10, 1985.
- 4. Proposed Change NPF-10-210 is a request to revise Technical Specification 3/4.6.2 "Iodine Removal System." The proposed change would delete existing requirements related to the spray chemical addition system and add new requirements for the use of trisodium phosphate for post-accident containment sump pH control.
- 5. Proposed Change NPF-10-212 is a request to revise Technical Specification 3/4.7.6 "Snubbers." The proposed change revises requirements relating to visual inspection and refueling interval inspections of snubbers to reflect current NRC Staff positions. This proposed change was previously submitted by SCE's letter dated December 12, 1985.
- 6. Proposed Change NPF-10-213 is a request to revise Technical Specification 3/4.1.1.2 "Moderator Temperature Coefficient." The proposed change would increase the negative MTC limit from  $-2.5 \times 10 - 4^{4}$  delta k/k/<sup>O</sup>F to  $-3.0 \times 10 - 4^{4}$  delta k/k/<sup>O</sup>F. This proposed change was previously submitted by SCE's letter dated November 27, 1985.

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7. Proposed Change NPF-10-214 is a request to revise Technical Specification 3/4.4.7 "RCS Specific Activity." The proposed change would revise actions and reporting requirements relating to RCS specific activity to be consistent with NRC Generic Letter 85-19.

Pursuant to 10 CFR 170.12, an amendment application fee of \$150.00 is required for each license amendment request. Accordingly, the Southern California Edison Company's check for \$150.00 is enclosed.

PWS:5047F

Subscribed on this \_\_\_\_\_\_ day of \_\_\_\_\_\_ February, 1986

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By Kinneth P Baston

Subscribed and sworn to before me this 7th day of February 1986. Notary Public in and for the County of Los Angeles, State of California My Commission Expires: 1986



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

By

## SAN DIEGO GAS & ELECTRIC COMPANY

Holeinle By:

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

David Ry By:

Subscribed and sworn to before me this pnyan 1986. day of (

Notary Public in and for the county of San Djego, State of California



THE CITY OF ANAHEIM By: Anden W. Hor

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

By: Clan R Watts

Subscribed and sworn to before me this January 1986. 3rd \_\_\_\_ day of \_\_\_

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Notary Public on and for the County of Orange, State of California



### THE CITY OF RIVERSIDE

Fut / Wales By:

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

By: alun R Watts

Subscribed and sworn to before me this the day of anuary, 1986. 5

Notary Public in and for the County of

Riverside, State of California

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### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

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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. 3 of the San Onofre Nuclear Generating Station

DOCKET NO. 50-362

Amendment Application No. 19

SOUTHERN CALIFORNIA EDISON COMPANY, <u>ET</u> <u>AL</u>. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 19.

This amendment application consists of the following proposed changes to Facility Operating License No. NPF-15:

- Proposed Change NPF-15-198 is a request to revise Technical Specification 3/4.5.2 "ECCS Sub-Systems, Tavg greater than or equal to 350<sup>0</sup> F." The proposed change would delete RWST Isolation Valve 10-068 from surveillance requirement 4.5.2.a. Currently, the position of this valve must be verified as locked open once every 12 hours. A design change will remove this valve from the system, therefore, the surveillance requirement will no longer be performed.
  - 2. Proposed Change NPF-15-207 is a request to revise Technical Specifications 3/4.3.2 "ESFAS Instrumentation," 3/4.6.3 "Containment Isolation Valves," and 3/4.7.1.5 "Main Steam Isolation Valves." The proposed change would increase the MSIV response time from 5 to 8 seconds.

- 3. Proposed Change NPF-15-209 is a request to revise Technical Specification 3/4.9.6 "Refueling Machine." The proposed change would add limiting conditions for operation and surveillance requirements for the auxiliary hoist which is being added to the refueling machine. This proposed change was previously submitted by the Southern California Edison Company's (SCE) letter dated December 10, 1985.
- 4. Proposed Change NPF-15-210 is a request to revise Technical Specification 3/4.6.2 "Iodine Removal System." The proposed change would delete existing requirements related to the spray chemical addition system and add new requirements for the use of trisodium phosphate for post-accident containment sump pH control.
- 5. Proposed Change NPF-15-212 is a request to revise Technical Specification 3/4.7.6 "Snubbers." The proposed change revises requirements relating to visual inspection and refueling interval inspections of snubbers to reflect current NRC Staff positions. This proposed change was previously submitted by SCE's letter dated December 12, 1985.
- 6. Proposed Change NPF-15-213 is a request to revise Technical Specification 3/4.1.1.2 "Moderator Temperature Coefficient." The proposed change would increase the negative MTC limit from  $-2.5 \times 10 - 4^{4}$  delta k/k/<sup>O</sup>F to  $-3.0 \times 10 - 4^{4}$  delta k/k/<sup>O</sup>F. This proposed change was previously submitted by SCE's letter dated November 27, 1985.

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7. Proposed Change NPF-15-214 is a request to revise Technical Specification 3/4.4.7 "RCS Specific Activity." The proposed change would revise actions and reporting requirements relating to RCS specific activity to be consistent with NRC Generic Letter 85-19.

Pursuant to 10 CFR 170.12, an amendment application fee of \$150.00 is required for each license amendment request. Accordingly, the Southern California Edison Company's check for \$150.00 is enclosed.

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PWS:5048F

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Subscribed on this \_\_\_\_\_7th \_\_\_\_day of \_\_\_\_\_February, 1986

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By Numith & Bush

Subscribed and sworn to before me this 7th day of <u>February 1986</u>. Notary Public in and for the County of Los Angeles, State of California My Commission Expires: (110 27. 1986



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

By

## SAN DIEGO GAS & ELECTRIC COMPANY

Holcomb By:

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

By: David RI

Subscribed and sworn to before me this \_\_\_\_ day of (<u>anuary, 1986</u>.

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



THE CITY OF ANAHEIM

Godon W. How By:

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

By: Olun R Watts

Subscribed and sworn to before me this <u>3rd</u> day of <u>Junuary 1986</u>.

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

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## THE CITY OF RIVERSIDE

Pourt / lialo By:

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

By: alan R Watts

Subscribed and sworn to before me this \_\_\_day\_of\_\_ January, 1986.

Danna L. Heuser

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



## DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGE NPF -10/15-198

This is a request to revise Technical Specification 3/4.5.2 "ECCS Subsystems -Tavg Greater Than or Equal to 350°F."

## Existing Specifications:

Unit 2: See Attachment A Unit 3: See Attachment B

## Proposed Specifications:

Unit 2: See Attachment C Unit 3: See Attachment D

## <u>Description</u>

The proposed change will revise Surveillance Requirement 4.5.2.a. of Technical Specification 3/4.5.2, "ECCS Subsystems - Tavg Greater Than or Equal to 350°F" which concerns verification of valve position. The purpose of Technical Specification 3/4.5.2 is to ensure operability of each ECCS component required by the assumptions used in the accident analyses.

Technical Specification 3/4.5.2 currently requires that valve 10"-068 have its position verified as locked open at least once every 12 hours. This proposed change will delete valve 10"-068 from the surveillance requirements based on the implementation of design change package (DCP) 6437N which removes the internals from valve 10"-068.

#### Safety Analysis

The proposed change described above shall be deemed to involve a significant hazards consideration if there is a positive finding in any of the following areas:

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

#### Response: No

The internals of manual valve 10"-068 will be removed. At the present time this manual valve is locked open. Removing the valve internals and replacing with a valve cover will not affect the existing seismic category or quality class of the piping or valve body. Mini-flow isolation can be accomplished by existing

individual pump isolation valves. Therefore, the proposed change will not involve a significant increase in the probability or consequences of any accident previously evaluated.

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

Response: No

Removal of the internals of manual valve 10"-068 will not affect operation of the ECCS. This valve is presently locked open. The valve body, valve cover and piping will retain the existing seismic category and quality class. Removal of valve 10"-068 internals will ensure the common portion of piping between the refueling water storage tank and engineered safety features pumps mini-flow line will be open without reliance on administrative controls. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No

Manual valve 10"-068 is presently locked open. This valve is located in the common piping between the refueling water storage tank and the engineered safety feature pumps mini-flow lines. Removal of valve 10"-068 internals will ensure the flow path to the refueling water storage tank remains open without reliance on administrative controls. The quality class and seismic category of the valve body, valve cover and piping are unaffected by this change. Existing individual pump valves provide the capability for mini-flow isolation. Therefore, the proposed change will not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (48FR14870) of amendments that are considered not likely to involve significant hazards considerations. Example (1) relates to a purely administrative change to the technical specification. An example of this type of change would be one which achieves consistency throughout the specifications, corrects an error or changes nomenclature.

The proposed change will remove the internals from manual valve 10"-068. The present Technical Specifications require valve 10"-068 to be locked open. Removing the internals of the valve is equivalent to the Technical Specification intent of having the valve locked open. Because the proposed change is administrative, it is similar to Example (1).

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# Safety and Significant Hazards Determination

Based on the above safety analysis, 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 a 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.

TJM:4636F



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# NPF-10/15-198







ATTACHMENT A

(Existing Technical Specification)