

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 No. 91  
Generating Station )

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS  
& ELECTRIC COMPANY, pursuant to 10 CFR 50.90, hereby submit  
Amendment No. 91.

This amendment consists of Proposed Change No. 93 to  
the Technical Specifications incorporated in Provisional  
Operating License No. DPR-13 as Appendices A and B. Proposed  
Change No. 93 is a request to modify the existing Technical  
Specifications to revise the definition of the term Operable to  
make it consistent with the definition used in the Standard  
Technical Specifications. A new section has been added to  
clarify the method of applying the new definition when  
circumstances arise which are not addressed in particular  
Technical Specifications.

In the event of conflict, the information in this  
Amendment No. 91 supersedes the information previously  
submitted.

Accordingly, it is concluded that (1) the proposed change does not involve an unreviewed safety question as defined in 10 CFR 50.59, nor does it present significant hazards considerations not described or implicit in the Final Safety Analysis, and (2) there is a reasonable assurance that the health and safety of the public will not be endangered by the proposed change.

Pursuant to 10 CFR 170.22, Proposed Change No. 93, submitted as Amendment No. 91, is determined to be a Class II change. The basis for this determination is that the change involves modifications of a Technical Specification format only to conform to that of the Standard Technical Specifications and has no safety or environmental significance. As indicated in the document entitled, "Guidance for Assessing the Proper Licensing Fee" which was transmitted by letter dated July 12, 1979, changes of this type are determined to be Class II Amendments.

Accordingly, the fee of \$1,200 corresponding to this determination is remitted herewith as required by 10 CFR 170.22.

Subscribed on this 30<sup>th</sup> day of June, 1980.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

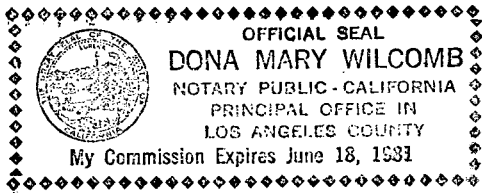
BY Robert Dietch

Robert Dietch  
Vice President

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

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

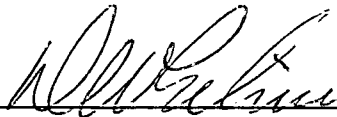
My Commission Expires: June 18, 1981



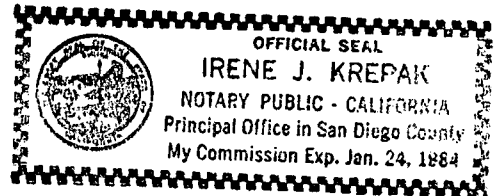
Subscribed on this 27<sup>th</sup> day of June 1980.

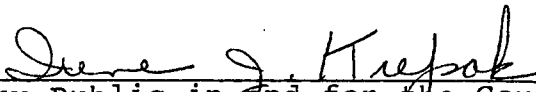
Respectfully submitted,

SAN DIEGO GAS & ELECTRIC COMPANY

By   
D. W. Gilman  
Vice President

Subscribed and sworn to before me this  
27<sup>th</sup> day of June 1980.



  
Notary Public in and for the County of  
San Diego, State of California  
Irene J. Krepak

My Commission Expires: Jan. 24, 1984

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

By Charles R. Kocher  
Charles R. Kocher

David R. Pigott  
Samual B. Casey  
Chickering & Gregory  
Attorneys for San Diego  
Gas & Electric Company

By David R. Pigott  
David R. Pigott

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.        was  
served on the following by deposit in the United States Mail,  
postage prepaid, on the 1st day of July, 1980.

Henry J. McGurren, Esq.  
Staff Counsel  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20545

David R. Pigott, Esq.  
Samuel B. Casey, Esq.  
Chickering & Gregory  
Three Embarcadero Center  
San Francisco, California 94111

I. R. Caraco  
Bechtel Corporation  
P. O. Box 60860, Terminal Annex  
Los Angeles, California 90060

Michael L. Mellor, Esq.  
Thelen, Marrin, Johnson & Bridges  
Two Embarcadero Center  
San Francisco, California 94111

Huey Johnson  
Secretary for Resources  
State of California  
1416 Ninth Street  
Sacramento, California 95814

Janice E. Kerr, General Counsel  
California Public Utilities Commission  
5066 State Building  
San Francisco, California 94102

J. Rengel  
Atomic Power Division  
Westinghouse Electric Corporation  
Box 355  
Pittsburgh, Pennsylvania 15230

A. E. Gaede  
P. O. Box 373  
San Clemente, California 92672

Frederick E. John, Executive Director  
California Public Utilities Commission  
5050 State Building  
San Francisco, California 94102

Docketing and Service Section  
Office of the Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

*Charles R. Kocher*

---

Charles R. Kocher  
Assistant General Counsel  
Southern California Edison Company

DESCRIPTION OF PROPOSED CHANGE AND SAFETY ANALYSIS  
PROPOSED CHANGE NO. 93 TO THE TECHNICAL SPECIFICATIONS  
PROVISIONAL OPERATIONAL LICENSE DPR-13

This is a request to (1) revise Appendix A Technical Specification 1.0, DEFINITIONS, and (2) add a new Section 3.0, LIMITING CONDITIONS FOR OPERATION (GENERAL).

Reason for Proposed Change

In an effort to clarify the meaning of the term Operable when used within the context of the Limiting Conditions for Operation, the NRC transmitted a request, by letter dated April 10, 1980, for submittal of proposed changes to the Technical Specifications which incorporate the requirements of the Model Technical Specifications included as Enclosure 1 to their letter. By letter dated May 15, 1980, a commitment was provided to the NRC for submittal of the requested proposed changes to the Technical Specifications.

Existing Specification

Technical Specification 1.0 currently includes the following definition of the term Operable:

"Operable:

Operable means that the system or component is completely capable of performing its required function in its required manner."

Technical Specification 3.0 does not currently exist.

Proposed Specification

Technical Specification 1.0 would be revised to include the following definition of the term Operable:

"Operable:

A system, subsystem, train, component or device shall be Operable or have Operability when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s)."



A new Section 3.0 will be added to the Limiting Conditions for Operation to read:

"3.0 LIMITING CONDITIONS FOR OPERATION (GENERAL)

Applicability: Applies to the operational requirements to be implemented when specific actions are not identified within individual Limiting Conditions for Operation.

Objective: To ensure that the station is placed in a safe condition when circumstances arise which are not identified within individual Limiting Conditions for Operation.

Specification:

- A. In the event a Limiting Condition for Operation and/or associated Action requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, the unit shall be placed in at least Hot Shutdown within 1 hour, and in at least Cold Shutdown within the following 30 hours unless corrective measures are completed that permit operation under the permissible Action statements for the specified time interval as measured from initial discovery or until the reactor is placed in a mode of operation in which the specification is not applicable. Exceptions to these requirements shall be stated in the individual specifications.
- B. When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered Operable for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is Operable, and (2) all of its redundant system(s), subsystems(s), train(s), component(s), and device(s) are Operable, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied, the unit shall be placed in at least Hot Shutdown within 1 hour, and in at least Cold Shutdown within the following 30 hours. This specification is not applicable during the Cold Shutdown or Refueling modes of operation.

Basis: Specification A delineates the action to be taken for circumstances not directly provided for in the Action statements and whose occurrence would violate the intent of the specification. For example, Technical Specification 3.3 requires in part that two recirculation pumps be

Operable in order for the reactor to be made or maintained critical and provides explicit action requirements if one recirculation pump is inoperable. Under the terms of Specification A, if more than one recirculation pump is inoperable, the unit is required to be in at least Hot Shutdown within 1 hour and in at least Cold Shutdown within 30 hours unless corrective measures are completed. It is assumed that the unit is brought to the required mode of operation within the required times by promptly initiating and carrying out the appropriate action statement.

Specification B delineates what additional conditions must be satisfied to permit operation to continue, consistent with the Action statements for power sources, when a normal or emergency power source is not Operable. It specifically prohibits operation when one division is inoperable because its normal or emergency power source is inoperable and a system, subsystem, train, component, or device in another division is inoperable for another reason.

The provisions of this specification permit the Action statements associated with individual systems, subsystems, trains, components, or devices to be consistent with the Action statements of the associated electrical power source. It allows operation to be governed by the time limits of the Action statement associated with the Limiting Condition for Operation for the normal or emergency power source, not the individual Action statements for each system, subsystem, train, component or device that is determined to be inoperable solely because of the inoperability of its normal or emergency power source.

For example, Specification 3.7 requires that two emergency diesel generators be Operable. The Action statement provides for a 72 hour out-of-service time when one emergency diesel generator is not Operable. If the definition of Operable were applied without consideration of Specification B, all systems, subsystems, trains, components and devices supplied by the inoperable emergency power source would also be inoperable. This would dictate invoking the applicable Action statements for each of the applicable Limiting Conditions for Operation. However, the provisions of Specification B permit the time limits for continued operation to be consistent with the Action statement for the inoperable emergency diesel generator instead, provided the other specified conditions are satisfied. In this case, this

would mean that the corresponding normal power source must be Operable, and all redundant systems, subsystems, trains, components and devices must be Operable, or otherwise satisfy Specification B (i.e., be capable of performing their design function and have at least one normal or one emergency power source Operable). If they are not satisfied, shutdown is required in accordance with this specification.

As a further example, Specification 3.7 requires in part that two physically independent offsite power lines be Operable. The Action statement provides a 24 hour out-of-service time when both required offsite power lines are not Operable. If the definition of Operable were applied without consideration of Specification B, all systems, subsystems, trains, components and devices supplied by the inoperable normal power sources, both of the offsite power lines, would also be inoperable. This would dictate invoking the applicable Action statements for each of the applicable LCOs. However, the provisions of Specification B permit the time limits for continued operation to be consistent with the Action statement for the inoperable normal power sources instead, provided the other specified conditions are satisfied. In this case, this would mean that for one division, the emergency power source must be Operable (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components and devices in the other division must be Operable, or likewise satisfy Specification B (i.e., be capable of performing their design functions and have an emergency power source Operable). In other words, both emergency power sources must be Operable and all redundant systems, subsystems, trains, components and devices in both divisions must also be Operable. If these conditions are not satisfied, shutdown is required in accordance with this specification.

In the Cold Shutdown or Refueling modes of operation, Specification B is not applicable, and thus the individual Action statements for each applicable Limiting Condition for Operation in these modes of operation must be adhered to."

### Safety Analysis

The Technical Specifications are formulated to preserve the single failure criterion for systems that are relied upon in the Final Safety Analysis (FSA). By and large, the single failure criterion is preserved by specifying Limiting Conditions for Operation (LCOs) that require all redundant components

of safety related systems to be Operable. When the required redundancy is not maintained, either due to equipment failure or maintenance outage, action is required, within a specified time, to change the operating mode of the plant to place it in a safe condition. The specified time to take action, usually called the equipment out-of-service time, is a temporary relaxation of the single failure criterion, which, consistent with overall system reliability considerations, provides a limited time to fix equipment or otherwise make it Operable. If equipment can be returned to Operable status within the specified time, plant shutdown is not required.

LCOs are specified for each safety related system in the plant, and with few exceptions, the Action statements address single outages of components, trains or subsystems. For any particular system, the LCO does not address multiple outages of redundant components, nor does it address the effects of outages of any support systems - such as electrical power or cooling water - that are relied upon to maintain the Operability of the particular system. This is because of the large number of combinations of these types of outages that are possible. Instead, the Technical Specifications employ general specifications and an explicit definition of the term Operable to encompass all such cases. These provisions have been formulated to assure that no set of equipment outages would be allowed to persist that would result in the facility being in an unprotected condition. These specifications are contained in the Standard Technical Specifications and are incorporated into the San Onofre Unit 1 Technical Specifications by this Proposed Change. Illustrative examples of how these specifications apply are contained in the associated Bases.

Based upon the analysis provided above, it is concluded that (1) the proposed change does not involve an unreviewed safety question as defined in 10CFR50.59, nor does it present significant hazards considerations not described or implicit in the Final Safety Analysis, and (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change.