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SUBJECT: Submits addl safety analysis clarification for review of
 Proposed Change NPF-10-34, Amend 11, re accident analysis, in
 response to NRC request.

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September 8, 1982

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K. P. BASKIN
MANAGER OF NUCLEAR ENGINEERING,
SAFETY, AND LICENSING

Director, Office of Nuclear Reactor Regulation
Attention: Mr. Frank Miraglia, 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

By letter dated September 7, 1982 the Nuclear Regulatory Commission (NRC) was requested to expedite its review of Proposed Change NPF-10-34 which was formally submitted as part of Amendment Application No. 11. The purpose of this letter is to provide additional safety analysis clarification in response to a verbal request of NRC Staff.

Safety Analysis:

These changes reflect a change from preliminary data to final data. The calculations have been verified and documented by Combustion Engineering(CE) under their approved QA program.

The FSAR Chapter 15 accident analyses establish the events which take credit for the low reactor coolant flow trip, and these analyses also establish the associated minimum acceptable values for the variables governing the trip setpoints. Because these events are "decreasing flow events", the setpoints sensitivity is to time(that is, value of flow rate at time of trip) rather than initial flow rate. (Note that minimum steady-state flow is specified in Tech Spec Section 3.2.5). The setpoint values shown in the proposed Table 2.2-1, item 11 in psid are the verified and documented values corresponding to the Chapter 15 analyses. The analyses for the sheared shaft accident(FSAR Section 15.3.3.2) remain conservative for the setpoint values shown in the proposed Table 2.2-1.

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September 8, 1982

The values presently given in Table 2.2-1 item 11 are based on a very conservative representation of the trip setpoints in percent of a reference value. Since flow testing had not been completed at the time these values were specified, it was not known how conservative they would be. In fact, because the measured Δp input signal has an oscillation of about 2.5 psid peak to peak, the present setpoints result in spurious channel trips. The flow signals from the steam generator Δp instruments were measured as part of the post-core hot functional testing and found acceptable. Oscillations of the steam generator Δp signals as observed on SONGS Unit 2 are typical of those observed for these instrument channels on other CE plants.

Consequently, to insure operability of the reactor coolant flow-low trip function it is necessary to use the actual values of the trip setpoints in psid to provide sufficient margin to preclude spurious reactor trips while maintaining the minimum required values for these setpoints from the accident analysis.

If you have any questions or if I can be of any assistance to you, please contact me.

Very truly yours,

K.P. Baskin / D. Palmer

cc: Mr. H. Rood, Project Manager
License Branch No. 3