

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 64 TO PROVISIONAL OPERATING LICENSE NO. DPR-13

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

SAN ONOFRE UNIT NO. 1

DOCKET NO. 50-206

- 1.0 INTRODUCTION AND DISCUSSION
- 1.1 ~ Technical Specification 3.0

By letter dated April 10, 1980, we transmitted to Southern California Edison Company (the licensee), model Technical Specifications which, among other matters, defined the normally required time intervals for entering various subcritical operational modes (Hot Standby, Hot Shutdown, Cold Shutdown, etc.) when a Limiting Condition for Operation (LCO) and/or the associated Action statement could not be satisfied.* This portion of the model Technical Specifications (with a minor variation) was derived directly from the then current edition of the Westinghouse Standard Technical Specification (NUREG-0452, Revision 2).

The letter of April 10, 1980, also requested the licensee to submit proposed changes to the facility technical specifications which would incorporate the requirements of the model Technical Specifications. The licensee made such a submittal, in compliance with the model Technical Specifications, by letter dated June 30, 1980. After incorporating certain revisions which were mutually agreeable to the licensee and the staff, the facility technical specifications were modified accordingly by License Amendment 56, dated June 11, 1981.

The present action has arisen because, since our letter of April 10, 1980, this same section of the Westinghouse Standard Technical Specifications has been revised (Revisions 3 and 4). These changes were made by the staff to permit a more orderly transition to subcritical modes and reduce the need for large changes in reactor power level when a deficient condition is correctable on a short time scale. Accordingly, by letter dated December 8, 1981, the licensee requested that this section of the facility technical specifications be changed to reflect the staff's revised position.

*Exceptions to these normal requirements are stated in individual specifications.

1.2 Technical Specification 6.9.2a(4)

By letter dated December 8, 1981, the licensee requested revision of the reactivity criteria for making prompt reports to the NRC as stated in the facility technical specifications. The basis for the request was that the values stated in the present specification conflict with those stated in the Westinghouse Standard Technical Specifications (NUREG-0452, Revision 3) and with the value stated in the present specifications in Section 4.8.A.

2.0 EVALUATION

2.1 Technical Specification 3.0

The effect of granting the licensee's request regarding this specification would be to substitute for the previous staff position, the staff's current position regarding the time normally to be allowed to initiate shutdown and reach various shutdown modes when an LCO and/or the associated Action statement cannot be satisfied. While the change in time to reach hot standby has been extended, there will be no significant reduction in the margins of safety. The additional time will permit a more orderly power reduction, eliminate the possibility of having to trip the reactor to meet the time restraint and thus avoid introducing system transients, and provide adequate time to arrange replacement power for the grid. As noted in paragraph 1.1, the revised position was adopted to permit a more orderly transition to subcritical modes under prescribed conditions and to reduce the need for large changes in reactor power level when a deficient condition is correctable on a short time scale. It is noted that the staff's current position is already reflected in the Technical Specifications for San Onofre Unit 2.

Although the staff considers the current provisions to be an improvement over those presently in place at Unit 1, it believes the difference to be minor. Therefore, the staff has not requested licensees with the earlier provisions in their technical specifications to upgrade to the current position. At the same time, however, because the current provisions are considered an improvement, the staff has no objection to their implementation when requested.

Accordingly, we conclude that the proposed revision of Section 3.0 of the San Onofre Unit 1 Technical Specifications does conform with the current staff position on this matter, and is, therefore, acceptable:

2.2 Technical Specifications 6.9.2.a(4)

The effect of granting the licensee's request regarding this specification is to change the units of reactivity from "dollars" and "cents" to "percent delta k/k." This is an administrative change to correct an apparent error made at the time of issuance of the specification and make the reporting requirements for this facility consistent with the standard reporting requirements. We, therefore, find this change acceptable.

3.0 ENVIRONMENTAL CONCLUSION

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and, pursuant to $10 \ \text{CFR} \ \$ \ 51.5(d)(4)$, that an environmental impact statement, or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that:
(1) because the amendment does not involve a significant increase in
the probability or consequences of an accident previously evaluated,
does not create the possibility of an accident of a type different from
any evaluated previously, and does not involve a significant reduction
in a margin of safety, the amendment does not involve a significant
hazards consideration; (2) there is reasonable assurance that the health
and safety of the public will not be endangered by operation in the
proposed manner; and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the
health and safety of the public.

5.0 ACKNOWLEDGEMENTS

The following individuals contributed to this evaluation:

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Date: October 6, 1982