

## UNITED STATES **NUCLEAR REGULATORY COMMISSION REGION V**

1450 MARIA LANE, SUITE 210 **WALNUT CREEK, CALIFORNIA 94596** 

April 17, 1991

Docket No. 50-206

Southern California Edison Company P. O. Box 128 San Clemente, California 92672

Attention: Mr. H. E. Morgan, Vice President and Site Manager

Gentlemen:

REGION V WAIVER OF COMPLIANCE WITH SAN ONOFRE UNIT 1 TECHNICAL Subject:

SPECIFICATIONS (TS), SECTION 3.5.3, "CONTROL AND SHUTDOWN ROD MISALIGNMENT," ACTION B.2

In discussions between the Southern California Edison (SCE) staff and the NRC on April 16, 1991, as described in your letter dated April 17, 1991, you requested a temporary waiver of compliance with TS 3.5.3, "Control and Shutdown Rod Misalignment," Action B.2. Specifically, the requested waiver related to operability requirements for control rods during power operation.

Your verbal request and your April 17 letter noted that at about 4:30 a.m. on April 16, 1991, you determined that neither of the two banks of control rods could be inserted, due to failure of an interlock relay in the control rod drive system. You also stated that:

- These control rod banks remained fully capable of insertion on manual or automatic reactor trip;
- Reactor power, power distribution, and the position of all rods and banks were within the limits of applicable Technical Specifications;
- Prompt approval of a waiver, to be effective for a period of 36 hours (ending at 4:30 p.m. on April 17, 1991), was requested in order to preclude an unnecessary reactor shutdown during the brief period required to effect repairs;
- Although Unit 1 has a short core with a low power density, which is not subject to significant spatial xenon oscillation, you had initiated monitoring of axial offset at an increased frequency;
- Continued operation without the capability of inserting control banks using the rod control system was of minimal safety significance because of stable plant configuration, continuing ability of the control rods to be tripped, and certain other plant design features;

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- The inability of the rod control system to insert the control rod banks did not involve a significant hazards consideration as defined in 10 CFR 50.92; and
- The requested waiver did not involve a significant change or increase in occupational radiation exposure or release of offsite effluents.

Based on the information presented in your request, as documented in your April 17, 1991 letter and summarized above, you requested a waiver from Action B.2 of TS 3.5.3, which would have required Unit 1 to be placed into hot standby within 6 hours.

In view of the stated reasons and bases for your request, the compensatory actions taken, and the continuing operability of all reactor protective functions, your request for a temporary waiver was verbally approved at approximately 2:30 p.m. on April 16. This letter confirms that temporary waiver, approved for a 36-hour period ending at 4:30 p.m. on April 17. However, you also noted in your April 17 letter that the conditions requiring this waiver were corrected at 7:40 p.m. on April 16, 1991, and that Unit 1 was restored to full compliance with the TS at that time.

Sincerely,

K. E. Perkins, Deputy Director Division of Reactor Safety and Projects

cc: H. B. Ray, Senior Vice President, Nuclear State of California

## Southern California Edison Company

bcc: T. Murley, NRR

- J. Lieberman, OE
- J. Partlow, NRR

B. Boger, NRR Technical Assistant, DRP-I/II, NRR

- J. Dyer, NRR G. Kalman, NRR
- J. Martin, RV
- B. Faulkenberry, RV
- R. Zimmerman, ŘÝ
- S. Richards, RV P. Johnson, RV C. Caldwell, SRI
- M. Blume, RV
- A. Johnson, RV

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