

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

August 29, 1991

Docket No. 50-206

Mr. Harold B. Ray Senior Vice President Southern California Edison Company Irvine Operations Center 23 Parker Street Irvine. California 92718

Dear Mr. Ray:

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PDR

SUBJECT: TEMPORARY WAIVER OF COMPLIANCE TO SAN ONOFRE UNIT 1 TECHNICAL SPECIFICATION 3.3.1, OPERATING STATUS OF SAFETY INJECTION AND CONTAINMENT SPRAY SYSTEMS

This letter documents the granting of a temporary waiver of compliance to the Southern California Edison Company for San Onofre Nuclear Generating Station Unit 1 Provisional Operating License, DPR-13. Specifically, this action authorizes a waiver of compliance from certain Technical Specification (TS) 3.3.1.A. and 3.3.1.B. requirements. The waiver of compliance was issued verbally at 6:05 AM, PDT, on August 28, 1991, following an electronic transmission of the waiver request by the Southern California Edison Company. The waiver request is dated August 27, 1991.

The waiver involves the operability of redundant Safety Injection System components listed in TS 3.3.1.A and 3.3.1.B. These specifications contain a list of components in both trains of the safety injection system and require the components to be operable when the reactor is critical. There are no unique action statements included with these specifications. Therefore, when the conditions of TS 3.3.1.A or 3.3.1.B are not met, the licensee is required to revert to the actions included in TS 3.0.3, which requires operators to commence plant shutdown within 1 hour and be in hot standby within the next 6 hours.

The 3.3.1 series specifications do not include provisions for taking components out of service for surveillance or maintenance and are in conflict with other requirements such as TS 4.1.1 that require monthly surveillance of components listed under TS 3.3.1. Westinghouse Standard Specifications permit components in the safety injection systems to be out of service for up to 72 hours, as long as one complete train of safety injection remains in service. The licensee submitted a request for a major revision to the safety-injectionrelated TS on August 31, 1990. When issued, this change is expected to include provisions to permit safety injection components to be out of service for up to 72 hours.

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The waiver granted on August 28, 1991, permits the licensee to continue operating at power for up to 72 hours with components in the safety injection system out of service if at least one train of the safety injection system is operable. The waiver will remain in effect until the safety injection system TS amendment is issued.

Sincerely,

Theodore & Quay for

Martin J. Virgilio, Assistant Director for Regions IV and V Reactors Division of Reactor Projects III/IV/V Office of Nuclear Reactor Regulation

cc: See next page

Mr. Harold B. Ray Southern California Edison Company

cc: Mr. Phil Johnson U.S. Nuclear Regulatory Commission Region V 1450 Maria Lane, Suite 210 Walnut Creek, California 94596

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Resident Inspector, San Onofre NPS c/o U.S. Nuclear Regulatory Commission P. O. Box 4329 San Clemente, California 92674

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Regional Administrator, Region V U.S. Nuclear Regulatory Commission 1450 Maria Lane, Suite 210 Walnut Creek, California 94596

Mr. John Hickman Senior Health Physicist Environmental Radioactive Mgmt. Unit Environmental Management Branch State Department of Health Services 714 P Street, Room 616 Sacramento, California 95814

Mr. Don J. Womeldorf Chief, Environmental Management Branch California Department of Health Services 714 P Street, Room 616 Sacramento, California 95814 San Onofre Nuclear Generating Station, Unit No. 1

Mr. Richard J. Kosiba, Project Manager Bechtel Power Corporation 12440 E. Imperial Highway Norwalk, California 90650

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Harold B. Ray

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Sincerely,

ORIGINAL SIGNED BY J. Guary Martin J. Virgilio, Assistant Director for Regions IV and V Reactors Division of Reactor Projects III/IV/V Office of Nuclear Reactor Regulation

cc: See next page

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