

BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON)	
COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY)	DOCKET NO. 50-206
for a Class 104(b) License to Acquire,)	
Possess, and Use a Utilization Facility as)	Amendment Application
Part of Unit No. 1 of the San Onofre Nuclear)	No. 188, Supplement 3
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY,
pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 188,
Supplement 3.

This amendment application consists of Proposed Change No. 151, Revision 3, to
the Unit 1 Facility Operating License No. DPR-13. Proposed Change No. 151,
Revision 3, modifies the Technical Specifications, incorporated in Facility
Operating License No. DPR-13 as Appendix A. The proposed change will modify
Specification 3.3.1, "Safety Injection and Containment Spray Systems, Operating
Status."

Revision 3 contains the following changes: expansion and clarification of the
Westinghouse Standard Technical Specification (STS) 72-hour Action Statement
time limit for the Emergency Core Cooling Systems (ECCS), removal of
Specification 3.3.1.C, addition of extended mode requirements for ECCS and for
operation of the Recirculation System, clarification of Containment Spray System
requirements, removal of the action statement requirement for non-safety related
back-up saltwater cooling capacity, and editorial changes to make existing
specification consistent with the proposed requirements.

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Based on the significant hazards analysis provided in the "Description and Significant Hazards Consideration Analysis" of Proposed Change No. 151, Revision 3, it is concluded that (1) the proposed change does not involve a significant hazards consideration as defined in 10 CFR 50.92, and (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Harold B. Ray
Harold B. Ray
Senior Vice President

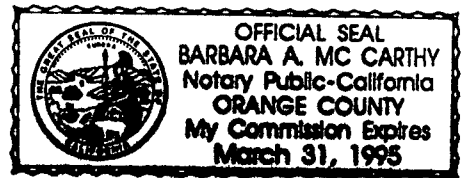
State of California

County of Orange

On June 5, 1992 before me, BARBARA A. MCCARTHY/NOTARY PUBLIC,
personally appeared HAROLD B. RAY, personally known to me to be
the person whose name is subscribed to the within instrument and acknowledged
to me that he executed the same in his authorized capacity, and that by his
signature on the instrument the person, or the entity upon behalf of which
the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature Barbara A. McCarthy



James A. Beoletto
Attorney for Southern
California Edison Company

By: James A. Beoletto
James A. Beoletto

DESCRIPTION AND SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS OF
PROPOSED CHANGE NUMBER 151, REVISION 3, TO THE TECHNICAL SPECIFICATIONS
FACILITY OPERATING LICENSE NO. DPR-13

This is a request to revise Technical Specification 3.3.1, "Safety Injection and Containment Spray Systems, Operating Status," of the Appendix A, Technical Specifications for San Onofre Nuclear Generating Station (SONGS), Unit 1. Revision 3, is a reduction in the scope of our previous request, Revision 2.

PROPOSED TECHNICAL SPECIFICATIONS

See Attachment 1.

EXISTING TECHNICAL SPECIFICATIONS

See Attachment 2.

DESCRIPTION

The proposed change revises Technical Specification 3.3.1, "Safety Injection and Containment Spray Systems, Operating Status." Previously, we had requested changes to most of Section 3.3, and several other sections of the Technical Specifications.^{4,7,10} These changes have been under review by the NRC. As we have discussed with NRR, due to the planned shutdown of Unit 1, we have reduced the scope of our previous request to expedite the approval process. Revision 3 is limited to those changes which are essential to remove unnecessary restrictions to operation and to correct deficiencies within Section 3.3.1.

Revision 3 contains the following changes that were previously submitted in Revision 2, and are described below:

- Expansion and Clarification of the Westinghouse Standard Technical Specification (STS) 72-hour Action Statement time limit for the Emergency Core Cooling Systems (ECCS).
- Removal of Specification 3.3.1.C - Testing of Redundant Components
- Addition of extended mode requirements for ECCS and for operation of the Recirculation System.
- Clarification of Containment Spray System requirements.
- Removal of the action statement requirement for non-safety related back-up saltwater cooling capacity.
- Editorial changes to make existing specification consistent with the proposed requirements.

The lack of a standard 72-hour action statement time limit in the existing specifications has resulted in the need to enter Technical Specification 3.0.3, and has required plant shutdowns and other actions which would not be required under standard plant specifications. The requirement to test ECCS components, prior to removing redundant components from service, is a non-standard requirement that is non-conservative by current standards and therefore, is being removed. The extended mode requirements for ECCS update the existing requirements based on criticality, and include requirements for the Recirculation and Containment Spray Systems. The clarification to the Containment Spray System requirements corrects a potentially non-conservative requirement for the spray flow limiting valves. The removal of the requirement for the non-safety related back-up saltwater cooling capacity is based on modifications for seismic qualification and improved system performance. The proposed change will satisfy long term corrective actions described in Licensee Event Reports (LER), LER 1-89-018², LER 1-89-024³, and LER 1-89-025⁴.

DISCUSSION

A. Addition of 72-hour Action Statement Time Limit

The proposed change implements previous commitments^{1,2,3,4} to incorporate operability requirements for the Recirculation and Containment Spray Systems into the specifications. The existing operability requirements for many of the ECCS components and flow paths do not provide sufficient action statements, since the existing specifications were written before the STS were issued. It has become necessary to enter Specification 3.0.3 whenever an ECCS component without an associated action statement becomes inoperable, even for a brief period of time. This has resulted in the need to obtain a temporary Waiver of Compliance^{8,9,13,14} for maintenance and testing of a redundant train of components which would normally have a 72-hour action statement under the STS.

The 72 hour time limit contained in the existing action statements for specific components is proposed to be replaced by new Action Statement 3.3.1.A, which will be applicable to the ECCS. Based on the STS requirements, the action statement allows one train of ECCS to be removed from operation for no longer than 72 hours.

Proposed Action Statement 3.3.1.B. for Mode 3 (RCS < 600 psig) and Mode 4, is for the lower modes when only one train of ECCS is required. Should the single required train become inoperable, action is required within one hour to restore the train to OPERABLE status, or to be in cold shutdown within 20 hours. This is consistent with the STS requirements.

B. Removal of Specification 3.3.1.C Testing of Redundant Components

Existing Technical Specification 3.3.1.C requires testing of redundant components or trains prior to entry into the associated action statements. As described in LER 1-89-018², "Voluntary Entry into Technical Specification 3.0.3 in order to Perform Surveillance of Containment Spray System Pump due to Inadequate TS," this requirement has placed the unit in a non-conservative configuration, and conflicts with the intent of the Technical Specifications. As reported in the LER, one containment spray pump had become inoperable. To comply with existing Specification 3.3.1.C, the Containment Spray System was required to be isolated during the test of the redundant pump. The STS do not require a surveillance of the redundant ECCS trains, or equipment, prior to removing a component from service. Therefore, the proposed change will delete Specification 3.3.1.C, to reduce the potential for non-conservative actions and to be consistent with the STS.

C. Extended mode requirements for ECCS and for operation of the Recirculation System.

The title of Section 3.3, "Safety Injection and Containment Spray Systems," has been changed to "Safety Injection, Recirculation, and Containment Spray Systems." The Recirculation System is used for core cooling and mixing of the reactor coolant following a design basis accident. Specific components of the Recirculation System are listed in the existing and proposed specifications, however the proposed change also addresses the overall operability of the Recirculation System. The Recirculation System includes those portions that also support containment spray (the recirculation pumps, heat exchanger, valves and flow paths), as well as recirculation. The Hot Leg Recirculation and Cold Leg Recirculation Systems are the portions of the Recirculation System required for recirculation to the Reactor Coolant System (RCS). The Secondary Recirculation System is for long term cooling after a Main Steam Line Break inside the containment which could disable portions of the decay heat removal systems that are not environmentally qualified. Note that the Hot Leg, Cold Leg, and Secondary Recirculation Systems also depend upon operation of supporting components, such as the recirculation pumps and heat exchanger. The division of the Recirculation System into these subsystems has been made in the proposed specifications to allow for both trains of the components that support containment spray to be operable in the lower modes. Additional editorial changes have been made to make the operability requirements consistent with the definition of OPERABILITY found in Section 1.0.

The proposed specifications require the ECCS based on mode of operation and remove the existing requirements based on criticality. Similar to the STS, both trains of ECCS are required to be OPERABLE in Modes 1, 2, and 3 when the RCS pressure is greater or equal to 600 psig.

Under the existing specifications, the safety injection and feedwater pumps are only required in MODES 1 and 2, and must be isolated from the RCS at an RCS pressure of 500 psig to provide overpressure protection and to preclude a

boron dilution event (UFSAR Section 6.3.2.8.2). The STS require two trains of safety injection capability until MODE 4 entry (350°F). In the proposed specifications, the transition is made at an RCS pressure of 600 psig, rather than MODE 4, to allow the safety injection and feedwater pumps to be isolated, as designed, prior to reducing RCS pressure to 500 psig. A pressure of 600 psig was chosen to allow operating personnel a 100 psi band to perform the isolation prior to reaching the required isolation point at 500 psig. During the limited time the RCS is in transition from 600 psig to 350°F, and through MODE 4, cold leg injection is under manual control and would be provided by the charging pump through the cold leg injection/recirculation valves.

D. Containment Spray System Changes.

It was determined that failure modes of the parallel containment spray flow limiting valves, CV-517 and CV-518, would cause an inadequate flow to the spray header in the event of loss of instrument air. Discussion of the system design and corrective actions were described in LER 89-024, "Unit 1 CV-517 and CV-518 Failure Mode on Loss of Instrument Air," submitted to the NRC on October 30, 1989. These valves are closed during the recirculation phase to block flow through the high flow orifice to prevent run-out of the recirculation pumps.

The proposed change will remove the current provisions of Specification 3.3.1.D, which has been determined to conflict with the operability requirements for the Containment Spray System. Proposed Action Statement 3.3.1.C.2 allows one spray flow limiter valve to be inoperable for 72 hours and requires both recirculation pumps be available if the valve is inoperable in the open position. This requirement will ensure adequate NPSH is available for the recirculation pumps, and provides adequate spray flow.

Consistent with the guidance of the STS, the proposed operability requirements for the Containment Spray System will require the system to be operable in Modes 1, 2, 3 and 4. Action Statement 3.3.1.C.1 was added consistent with the new requirement.

Existing specification 3.3.1.A.2 which specifies that the hydrazine tank limits comply with specification 3.3.4 has been removed, since it is redundant. The operability requirement for the Containment Spray System is considered to include the system components and flow path.

E. Removal of action statement requirement for non-safety related back-up saltwater cooling capacity.

Existing specification 3.3.1.A.(1).i requires operability of the non-safety related auxiliary saltwater cooling pump, or screen wash pumps to remove one of the two safety related salt water cooling pumps from operation for a 72 hour period. This requirement was added to the existing specifications

because the safety related pumps were not considered to be reliable, and some of the connecting piping was not seismically qualified. Since that time, the safety related pumps have been upgraded with the removal of power operated valves, and the installation of check valves. Additionally, the piping has been replaced with seismically qualified piping. A review of failure history for the two safety related pumps since 1984 (through July 1991) has shown that one pump has no recorded failures and the other has been required to be removed from operation on three occasions. The proposed specifications delete the requirement to operate the non-safety related back-up pumps prior to removing a salt water pump from operation.

F. Editorial changes to make existing specification consistent with the proposed requirements.

A number of editorial changes were made to make the proposed specifications consistent. These are:

The existing technical specifications contain an operability requirement in each LCO. The proposed specifications require the systems to be OPERABLE and have removed the requirements for each component to be specified. Additionally, the action statement requirements address the operability of support systems, consistent with the definition of operability found in Section 1.0.

Existing specification 3.3.1.A.(1).a which requires the RWST to comply with specification 3.3.3, has been removed as redundant.

Existing specification 3.3.1.A.(1).b has been clarified by stating that there are three RWST level channels per train.

Existing specification 3.3.1.A.(3) requires that valves and interlocks be OPERABLE. This has been changed to require, "Flow paths, valves, and interlocks associated with each train or common to both trains of the system," be OPERABLE. The change clarifies that system operability includes flow paths, and has been relocated to be consistent with the wording of the proposed specifications.

Existing specification 3.3.1.A.(4) for measurement of recirculation loop leakage has been renumbered and relocated in the proposed specifications.

The references have been updated to include the ECCS Single Failure Analysis, and associated documents.

The proposed specifications have been renumbered to coincide with the changes made.

SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

As required by 10 CFR 50.91 (a)(1), this analysis is provided to demonstrate that Proposed Change Number 151, Revision 3, for San Onofre Nuclear Generating Station, Unit 1 (SONGS 1) does not represent a significant hazards consideration. In accordance with the three factor test of 10 CFR 50.92(c), as demonstrated below, implementation of the proposed amendment was analyzed and found not to: 1) involve a significant increase in the probability or consequences for an accident previously evaluated; 2) create the possibility of a new or different kind of accident from any accident previously evaluated; or 3) involve a significant reduction in a margin of safety.

Significant Hazards Consideration Analysis

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of any accident previously evaluated?

Response: No

The Emergency Core Cooling System (ECCS) is designed to protect the core and to mitigate the radiological consequences in the worst design basis LOCA and MSLB. The ECCS also functions for less-severe accident conditions.

The proposed change to the existing specifications consists of the following:

- Expansion and Clarification of the Westinghouse Standard Technical Specification (STS) 72-hour Action Statement time limit for the Emergency Core Cooling System (ECCS).
- Removal Of Specification 3.3.1.C - Testing of Redundant Components
- Addition of extended mode requirements for ECCS and for operation of the Recirculation System.
- Clarification of Containment Spray System Requirements.
- Removal of the action statement requirement for non-safety related back-up saltwater cooling capacity.

The existing specifications do not provide an Allowed Outage Time (AOT) for many of the ECCS components. As a result, equipment outages often result in entry into Specification 3.0.3. The proposed change removes the need to enter Specification 3.0.3 by providing the STS 72-hour action statement for ECCS. This is consistent with the assumption of single failure relaxation in the corresponding action statements of the STS, and is consistent with assumptions of the accident analyses in Chapter 15 of the UFSAR and the Single Failure Analysis performed for SONGS 1. For operation in Modes 3 (with RCS < 600 psig) and Mode 4, the

proposed specifications require action be taken to restore the single required train within one hour, or the unit be placed in cold shutdown within 20 hours. Therefore, incorporation of the STS AOT does not significantly increase the probability or consequences of any accidents.

Existing Specification 3.3.1.C. requires the testing of redundant components prior to the removal of ECCS components from service. This is a non-standard specification which has been removed from the proposed specifications. Equipment performance and availability is assured by the surveillance requirements and operability requirements. This specification is in conflict with the operability requirements for ECCS, since it is often not feasible to test equipment without removing it from service, thereby degrading the availability of the ECCS. The removal of this additional test requirement therefore, will increase ECCS component availability, and not increase the probability or consequences of any accidents.

The existing specifications require ECCS components to be operable based on criticality. The proposed specifications update the specifications to the STS terminology based on mode of operation. The amendment provides for increased availability of cold leg safety injection by requiring the charging pump and recirculation systems in MODE 3 (below 600 psig) and MODE 4. The requirements for the Containment Spray System operation include Mode 4, consistent with the STS. The probability or consequences of an accident are not increased by adding these operational requirements to the specifications.

The proposed specifications differ from the STS in the Mode 4 requirements for safety injection. The STS requires one train of recirculation and safety injection to be operable in MODE 4; the proposed specifications allow for a single train to be operable below MODE 3 and an RCS pressure of 600 psig. This is necessary to comply with the design feature of SONGS 1 that uses the feedwater pumps for safety injection. It would not be appropriate to apply the standard plant requirement to retain the Safety Injection System fully operational until MODE 4 as the SONGS 1 Safety Injection System has a much higher flow capacity than the standard plant design. The existing specifications require the feedwater/safety injection pumps to be isolated from the RCS below 500 psig to preclude the potential for overpressurization, or boron dilution of the RCS. The proposed specifications allow isolation of the injection system at an RCS pressure of 600 psig to allow sufficient time to isolate the system prior to reaching the 500 psig limit of Specification 3.3.3.

Our analysis of normal shutdown decay heat removal requirements from 102% power after five hours, has shown that the limiting flow available via a single charging pump, including consideration of overpressurization restrictions on cold leg recirculation valve operation, is sufficient to meet decay heat removal requirements. Since normal shutdowns and shutdowns required by the Technical Specifications are nominally from a power level of 92% and require more than five hours

to be less than 600 psig, the probability or consequences of an accident are not increased by extending mode requirements for the ECCS.

The proposed change will remove the current provisions of Specification 3.3.1.D, which conflict with the operating requirements for the Containment Spray System. Proposed Action Statement 3.3.1.C allows one spray flow limiter valve to be inoperable for 72 hours and requires both recirculation pumps be available if the valve is inoperable in the open position. This requirement will ensure adequate NPSH is maintained for the recirculation pumps, and provides adequate spray flow. The proposed specification satisfies single failure criteria and therefore does not increase the probability or consequences of an accident.

The existing Specification 3.3.1.A.(1).i requirement to retain non-safety related salt water cooling capability (auxiliary or screen wash pumps) has been removed since the existing safety related piping and valves have been upgraded and proven reliable. The system will continue to provide component cooling as required and therefore the probability or consequences of an accident are not increased.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The existing specifications do not provide an Allowed Outage Time (AOT) for many of the ECCS components. As a result, equipment outages often result in entry into Specification 3.0.3. The proposed change removes the need to enter Specification 3.0.3 by providing the STS 72-hour action statement for ECCS. This is consistent with the assumption of single failure relaxation in the corresponding action statements of the STS, and is consistent with assumptions of the accident analyses in Chapter 15 of the UFSAR and the Single Failure Analysis performed for SONGS 1. For operation in Modes 3 (with RCS < 600 psig) and Mode 4, the proposed specifications require action be taken to restore the single required train within one hour, or the unit be placed in cold shutdown within 20 hours. The provision to incorporate the standard AOT does not introduce any new features of equipment operation that would create the possibility of a new or different type of accident.

Existing Specification 3.3.1.C. requires the testing of redundant components prior to the removal of ECCS components from service. This is a non-standard specification which has been removed from the proposed specifications. Equipment performance and availability is assured by the surveillance requirements and operability requirements. This specification is in conflict with the operability requirements for ECCS, since it is often not feasible to test equipment without removing it from service, thereby degrading the availability of the ECCS. The removal of this additional test requirement therefore, does not require

any additional operation of equipment and therefore does not introduce any factors which would create the possibility of a new or different type of accident.

The existing specifications require ECCS components to be operable based on criticality. The proposed specifications update the specifications with STS terminology based on mode of operation. The specifications also include requirements for the Recirculation System which are not explicitly addressed by the existing specifications. The amendment provides for increased availability of cold leg safety injection by requiring one train of charging and recirculation in MODE 3 (below 600 psig) and MODE 4. The potential results of ECCS operation in the lower modes of operation is within the boundaries of the analysis for overpressure protection. Overpressure protection is provided by administrative restrictions placed on operation of the charging system, and by the isolation of the feedwater/safety injection pumps from the ECCS below 500 psig. Therefore, the extended mode operability requirements for the ECCS do not create the possibility of a new or different type of accident.

The proposed change will remove the current provisions of Specification 3.3.1.D, which conflict with the operability requirements for the Containment Spray System. Proposed Action Statement 3.3.1.C allows one spray flow limiter valve to be inoperable for 72 hours and requires both recirculation pumps be available if the valve is inoperable in the open position. This requirement will ensure adequate NPSH is available for the recirculation pumps, and provides adequate spray flow. The proposed specification satisfies single failure criteria. The changes to the containment spray system requirements are within the current analysis and do not create the possibility of a new or different type of accident.

The existing specification 3.3.1.A.(1).i requirement to retain non-safety related salt water cooling capability (auxiliary or screen wash pumps) has been removed since the existing safety related piping and valves have been upgraded and proven reliable. The system will continue to provide component cooling as required and therefore the probability or consequences of an accident are not increased.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

Response: No

The proposed change provides relief from the provisions of the current Specification which causes unnecessary entry into Specifications 3.0.3. The current specifications were generally written prior to the issuance of the Westinghouse STS and do not contain action statements for many of the ECCS required components. The use of standard action statements will reduce the need to enter 3.0.3, thereby reducing the potential for shutdown transients and does not reduce the margin of safety.

Existing Specification 3.3.1.C. requires the testing of redundant components prior to the removal of ECCS components from service. This is a non-standard specification which has been removed from the proposed specifications. Equipment performance and availability is assured by the surveillance requirements and operability requirements. This specification is in conflict with the operability requirements for ECCS, as it is often not feasible to test equipment without removing it from service, thereby degrading the availability of the ECCS. Therefore, the margin of safety will not be reduced by removing the requirement to test ECCS components whenever a redundant component is removed from service.

The existing specifications require ECCS components to be operable based on criticality. The proposed specifications update the specifications to the STS terminology based on mode of operation and includes requirements for operation of the Recirculation System. The amendment provides for increased availability of cold leg safety injection by requiring one train of the charging pump and recirculation systems in MODE 3 (below 600 psig) and MODE 4. The use of an RCS pressure of 600 psig for isolation of the Safety Injection System, as opposed to the standard plant RCS temperature of 350°F, does not reduce the margin of safety since it is within the original plant design and does not degrade the ability to remove core decay heat.

The proposed change will remove the current provisions of Specification 3.3.1.D which conflict with the operability requirements for the Containment Spray System. Proposed Action Statement 3.3.1.C allows one spray flow limiter valve to be inoperable for 72 hours and requires both recirculation pumps be available if the valve is inoperable in the open position. This requirement will ensure adequate NPSH is available for the recirculation pumps, and provides adequate spray flow. The proposed specifications ensure the Containment Spray System and Recirculation System design flows will be maintained and therefore do not reduce the margin of safety.

The existing Specification 3.3.1.A.(1).i requirement to retain non-safety related salt water cooling capability (auxiliary or screen wash pumps) is proposed to be removed since the existing safety related piping and valves have been upgraded and proven reliable. The non-safety related back-up saltwater cooling pumps are not credited in any safety analysis. Therefore, removing the requirement to maintain the non-safety related pumps will have no effect on the margin of safety.

Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the

station on the environment as described in the NRC Final Environmental Statement.

References

1. "Reply to a Notice of Violation," Mr. Harold B. Ray (SCE) to NRC, dated January 25, 1990.
2. LER 1-89-018, "Voluntary Entry into Technical Specification 3.0.3 in order to Perform Surveillance of Containment Spray System Pump due to Inadequate TS," dated May 30, 1989.
3. LER 1-89-024, "Unit 1 CV-517 and CV-518 Failure Mode on Loss of Instrument Air," dated October 30, 1989.
4. LER 1-89-025, "Unit 1 CV-305 and FCV-1112 Single Failure Deficiency with Hot Leg Recirculation," dated October 12, 1989.
5. "Amendment Application No. 188," Mr. Harold B. Ray (SCE) to NRC, dated August 31, 1990.
6. "Amendment Application No. 188, Supplement 1," Mr. H. E. Morgan (SCE) to NRC, dated November 1, 1990.
7. "Amendment Application No. 188, Supplement 1,- Transmittal of PRA," Mr. F. R. Nandy (SCE) to NRC, dated May 2, 1991.
8. "Request for Temporary Waiver of Compliance, Level Transmitter Surveillance - Safety Injection," R. W. Krieger to NRC, dated August 9, 1991.
9. "Request for Temporary Waiver of Compliance, Level Transmitter Surveillance - Safety Injection, R.W. Krieger (SCE), to J. B. Martin (NRC-RV), dated August 26, 1991.
10. "Amendment Application No. 188, Supplement 2," Mr. Harold B. Ray (SCE) to NRC, dated September 9, 1992.
11. "Event Specific Single Failure Response Evaluation," SONGS 1, M-39419, Rev.3.
12. "ECCS Single Failure Analysis," SONGS 1, M-41383, Rev. 1
13. "Request for Temporary Waiver of Compliance, [SV-2900] Limit Switch Maintenance," R.W. Krieger to J. B. Martin (NRC-RV), dated April 20, 1992.
14. "Request for Temporary Waiver of Compliance, Valve Actuator Maintenance - Safety Injection System," R.W. Krieger (SCE), to J. B. Martin (NRC-RV), dated May 13, 1992.