

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 No. 179
Part of Unit No. 1 of the San Onofre Nuclear)
Generating Station)

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY, pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 179.

This amendment consists of Proposed Change No. 219 to Provisional Operating License No. DPR-13. Proposed Change No. 219 modifies the Technical Specifications incorporated in Provisional Operating License No. DPR-13 as Appendix A.

Proposed Change No. 219 is a request to revise the Technical Specifications to remove the 3.25 surveillance limit from Technical Specification 4.0.2. Technical Specification 4.0.2 allows surveillance intervals to be extended up to 25 percent of the specified time limit. However, Technical Specification 4.0.2 also limits the combined time interval for any three consecutive surveillance intervals to 3.25 times the specified interval. Generic Letter 89-14 has established that the removal of the 3.25 limit results in a benefit to safety and endorses the use of the 25 percent allowance for surveillances. This benefit is accomplished by permitting greater operating flexibility to schedule the surveillance. PCN 219 requests the removal of the 3.25 surveillance limit from Technical Specification 4.0.2 in accordance with the guidance provided in Generic Letter 89-14 .

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In the event of conflict, the information in Amendment Application No. 179 supersedes the information previously submitted.

Based on the significant hazards analysis provided in the Description and Significant Hazards Consideration Analysis of Proposed Change No. 219, 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.

Subscribed on this 11th day of June, 1990.

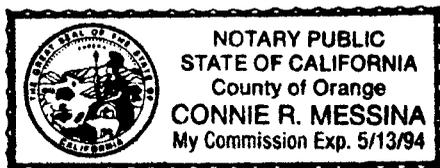
Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

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

Subscribed and sworn to before me this
11th day of June, 1990.

Connie R. Messina
Notary Public in and for the
State of California



James A. Beoletto
Attorney for Southern
California Edison Company

By: *James A. Beoletto*
James A. Beoletto

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of SOUTHERN CALIFORNIA)
EDISON COMPANY and SAN DIEGO GAS &)
ELECTRIC COMPANY (San Onofre Nuclear)
Generating Station, Unit No. 1))

Docket No. 50-206

CERTIFICATE OF SERVICE

I hereby certify that a copy of Amendment Application No. 179 was served on the following by deposit in the United States Mail, postage prepaid, on the 12th day of June, 1990.

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James A. Beoletto

DESCRIPTION AND SIGNIFICANT HAZARDS CONSIDERATION OF
PROPOSED CHANGE NO. 219 TO TECHNICAL SPECIFICATIONS FOR
PROVISIONAL OPERATING LICENSE NO. DPR-13

This is a request to revise the Surveillance Requirements (General) of Appendix A, Technical Specifications (TS) for San Onofre Nuclear Generating Station, Unit 1 in accordance with the guidance in NRC Generic Letter 89-14. this will affect TS Surveillance Requirement 4.0.2 and accompanying basis.

DESCRIPTION

Specification 4.0.2 allows surveillance intervals to be extended up to 25 percent of the specified interval. This extension facilitates the scheduling of surveillance activities and allows surveillances to be postponed when plant conditions are not suitable for conducting a surveillance. Specification 4.0.2 also limits extending surveillances so that the combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval. The intent of the 3.25 limit is to preclude routine use of the provision for extending a surveillance interval by 25 percent.

Generic Letter 89-14 has established that the 3.25 limitation of Specification 4.0.2 has not been a practical limit on the use of the 25 percent allowance for extending surveillances. The NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit on extending surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. The removal of the 3.25 limit will provide greater flexibility in the use of the provision for extending surveillance intervals, reduce the administrative burden associated with its use, and provides a positive effect on safety.

This proposed amendment does not take exception to any provision of Generic Letter 89-14 or include any additional items which are not consistent with the provisions of the Generic Letter.

EXISTING TECHNICAL SPECIFICATIONS

See Attachment 1

PROPOSED TECHNICAL SPECIFICATIONS

The proposed Technical Specifications are provided in Attachment 2. Change bars are used to illustrate the proposed revisions.

DISCUSSION

As suggested in Generic Letter 89-14, the proposed change removes the 3.25 limit from Technical Specification 4.0.2 and updates its accompanying Basis.

Removal of unnecessary restriction on extending surveillance requirements will result in a greater benefit to safety when plant conditions are not conducive to the conduct of the surveillance. This safety benefit is incurred, for example, when a surveillance is extended due to transient plant conditions or conditions in which safety systems are out of service because of ongoing surveillance or maintenance activities. In such cases, the safety benefit of allowing the use of the 25 percent allowance to extend a surveillance interval would outweigh any benefit derived by limiting three consecutive surveillance intervals to the 3.25 limit.

The administrative burden associated with tracking the use of the 25 percent allowance to ensure compliance of surveillance activities. Elimination of this portion will increase equipment control compliance of surveillance activities.

On the basis of these considerations, the NRC staff has concluded that removal of the 3.25 limit will have an over all positive impact on safety.

Modifications to the Basis for TS 4.0.2, as recommended by Generic Letter 89-14, have been incorporated.

SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

As required by 10 CFR 50.91(a)(1), this analysis is provided to demonstrate that the proposed license amendment to revise the general conditions for surveillance at SONGS-1 does not represent a significant hazards consideration. As demonstrated below, in accordance with the three-factor test of 10 CFR 50.92(c), implementation of the proposed license amendment was analyzed using the following standards and found not to:

- 1) involve a significant increase in the probability or consequences for an accident previously evaluated; or
- 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.

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

RESPONSE: NO

Removal of the 3.25 limit from the Surveillance Requirement does not modify the configuration of the facility or its mode of operation. The proposed change will, therefore, not involve a significant increase in the probability or consequences of accident previously evaluated.

Specific Surveillance Requirements, i.e., the mechanics of the actual surveillances, are not modified. The proposed change would remove the 3.25 limit from TS 4.0.2 and allows surveillance intervals to be extended up to 25 percent of the specified interval. The limitation of TS 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. The reliability ensured through surveillance activities is not degraded beyond that obtained from the specified time interval.

Generic Letter 89-14 has established that the use of the allowance to extend the surveillance intervals by 25 percent can also result in a significant safety benefit for surveillances that are performed on a routine basis during plant operation. This safety benefit is incurred when a surveillance interval is extended at a time that conditions are not suitable for performing the surveillance. An example would be plant transient operating conditions or conditions in which safety systems are out of service because of ongoing surveillance or maintenance activities. In such cases, the safety benefit of allowing the use of the 25 percent allowance to extend a surveillance interval would outweigh any benefit derived by limiting three consecutive surveillance intervals to the 3.25 limit.

The NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit because the risks to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation has not been a practical limit on the use of the 25 percent allowance for extending surveillances.

Therefore operation of the facility in accordance with this proposed change will not involve an increase in the probability or consequences of an accident previously evaluated.

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

Removal of the 3.25 limit from the Surveillance Requirement does not modify the configuration of the facility or its mode of operation. The proposed change will therefore not create the possibility of a new or different kind of accident from any previously evaluated.

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

RESPONSE: NO

The use of the allowance to extend surveillance intervals will result in a safety benefit when the surveillance is extended at a time that conditions are not suitable for performing the surveillance. The proposed change does not affect the operation of the facility, modify any method of surveillance performance, or revise any safety analysis conclusion. Operation of the facility in accordance with this proposed change will therefore not involve a significant reduction in a margin of safety.

SAFETY AND SIGNIFICANT HAZARDS DETERMINATION

Based on the safety evaluation, it is concluded that:

- 1) the proposed change does not constitute a significant hazards consideration as defined by 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;
- 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 Environmental Statement.

ATTACHMENT 1

EXISTING TECHNICAL SPECIFICATIONS

4.0 SURVEILLANCE REQUIREMENTS (GENERAL)

APPLICABILITY: Applies to the surveillance requirements to be implemented in these specifications.

OBJECTIVE: To define the conditions under which the surveillance requirements of Section 4 Specifications are applicable.

SPECIFICATION: 4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with:

- a. A maximum allowable extension not to exceed 25% of the surveillance interval, but
- b. The combined time interval for any 3 consecutive surveillance-intervals shall not exceed 3.25 times the specified surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.

BASIS: Specification 4.0.1 provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements. Surveillance Requirements for, Special Test Exceptions need only be performed when the Special Test Exception is being utilized as an exception to an individual specification.

The provisions of Specification 4.0.2 provide allowable tolerances for performing surveillance activities beyond those specified in the nominal surveillance interval. These tolerances are necessary to provide operational flexibility because of scheduling and performance considerations. The phrase "at least" associated with a surveillance frequency does not negate this allowable tolerance value and permits the performance of more frequent surveillance activities.

The tolerance values, taken either individually or consecutively over 3 test intervals, are sufficiently restrictive to ensure that the reliability associated with the surveillance activity is not significantly degraded beyond that obtained from the nominal specified interval.

The provisions of specification 4.0.3 set forth the criteria for determination of compliance with the OPERABILITY requirements of the Limiting Conditions for Operation. Under this criteria, equipment, systems or components are assumed to be OPERABLE if the associated surveillance activities have been satisfactorily performed within the specified time interval. Nothing in this provision is to be construed as defining equipment, systems or components, OPERABLE, when such items are found or known to be inoperable although still meeting the Surveillance Requirements.

Specification 4.0.4 ensures that the surveillance activities associated with a Limiting Condition for Operation have been performed within the specified time interval prior to entry into an, OPERATIONAL MODE or other applicable condition. The intent of this provision is to ensure that surveillance activities have been satisfactorily demonstrated on a current basis as required to meet the OPERABILITY requirements of the Limiting Condition for Operation.

Under the terms of this specification, for example, during initial plant startup or following extended plant outages, the applicable surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment into OPERABLE status.