BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON)
COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY)
for a Class 104(b) License to Acquire,) DOCKET NO. 50-206
Possess, and Use a Utilization Facility as)
Part of Unit No. 1 of the San Onofre Nuclear) Amendment No. 126
Generating Station)

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY, pursuant to 10 CFR 50.90, hereby submit Amendment No. 126.

This amendment application consists of Proposed Change No. 147 to the Technical Specifications incorporated in Provisional Operating License No. DPR-13 as Appendices A and B.

Proposed Change No. 147 is a request to revise the Appendix A

Technical Specifications, Section 1.0, Definitions, and Section 4.4, Emergency

Power System Periodic Testing. The proposed changes consist of several

changes recommended by the NRC by letter dated November 19, 1984, regarding

testing of the emergency diesel generators and two additional changes proposed

by the Licensee.

In the event of conflict, the information in Amendment Application No. 126 supersedes the information previously submitted.

Based on the safety analysis provided in the Description of Proposed Change and Safety Evaluation, it is concluded that (1) the proposed changes do not involve an unreviewed safety question as defined in 10 CFR 50.59, nor do they present significant hazards considerations not described or implicit in the Final Safety Analysis, and (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change.

A fee of \$150 is remitted herewith as required by 10 CFR 170.12.

Subscribed on this 14th day of February 1985

Respectfully submitted, SOUTHERN CALIFORNIA EDISON COMPANY

Ву

Kenneth P. Baskin

Vice President

Subscribed and sworn to before me this 14th day of Tebruary 1985.

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Notary Public in and for the County of

Los Angeles, State of California

My Commission Expires: lug 27 1986

OFFICIAL SEAL
AGNES CRABTREE
NOTARY PUBLIC - CALLOGS AN

PRINCIPAL OFFICE IN

LOS ANGELES COUNTY

My Commission Expires Aug. 27, 1986

Charles R. Kocher James A. Beoletto Attorneys for Southern California Edison Company

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lames A. Beoletto

Subscribed on this _7th day of _ February, 1985

Respectfully submitted, SAN DIEGO GAS & ELECTRIC COMPANY

G.D. Cotton

Vice President - Engineering

Subscribed and sworn to before me this

7th day of Lebruary 1985

Notary Public in and for the County of San Diego, State of California

My Commission Expires: 4/6/86

OFFICIAL SEAL

LORAINE E. GRAY

NOTARY PUBLIC - CALIFORNIA

PRINCIPAL OFFICE I.I

SAN DIEGO COUNTY

My Commission Exp. April 6, 1986

David R. Pigott Samuel B. Casey Orrick, Herrington & Sutcliffe Attorneys for San Diego Gas & Electric Company

David R. Pigott

BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of SOUTHERN)		
CALIFORNIA EDISON COMPANY)		
AND SAN DIEGO GAS & ELECTRIC)	DOCKET NO. 5	50-206
COMPANY (San Onofre Nuclear)		
Generating Station Unit No. 1))		

CERTIFICATION OF SERVICE

I hereby certify that a copy of Amendment No. 126 was served on the following by deposit in the United States Mail, postage prepaid, on the _____14th day of __February_____, 1985.

Henry J. McGurren, Esq. Staff Counsel U. S. Nuclear Regulatory Commission Washington, D.C. 20545

David R. Pigott, Esq. Samuel B. Casey, Esq. Orrick, Herrington & Sutcliffe 600 Montgomery Street San Francisco, California 94111

John V. Morowski Bechtel Power Corporation P.O. Box 60860, Terminal Annex Los Angeles, California 90060

Michael L. Mellor, Esq. Thelen, Marrin, Johnson & Bridges Two Embarcadero Center San Francisco, California 94111

Huey Johnson
Secretary for Resources
State of California
1416 Ninth Street
Sacramento, California 95814

Janice E. Kerr, General Counsel California Public Utilities Commission 5066 State Building San Francisco, California 94102 J. Rengel Atomic Power Division Westinghouse Electric Corporation Box 355 Pittsburgh, Pennsylvania 15230

A. I. Gaede P.O. Box 373 San Clemente, California 92672

Frederick E. John, Executive Director California Public Utilities Commission 5050 State Building San Francisco, California 94102

Docketing and Service Section Office of the Secretary U.S. Nuclear Regulatory Commission Washington, D.C. 20555

> James A. Beoletto Assistant Counsel

Southerd California Edison Company

BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

Application of	F SOUTHERN CALIFORNIA EDISON)
COMPANY and SA	AN DIEGO GAS & ELECTRIC COMPANY)
for a Class 10	D4(b) License to Acquire,) DOCKET NO. 50-206
	Jse a Utilization Facility as)
Part of Unit N	No. 1 of the San Onofre Nuclear) Amendment No. 126
Generating Sta		•)

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Proposed Change No. 147 is a request to revise the Appendix A

Technical Specifications, Section 1.0, Definitions, and Section 4.4, Emergency

Power System Periodic Testing. The proposed changes consist of several

changes recommended by the NRC by letter dated November 19, 1984, regarding

testing of the emergency diesel generators and two additional changes proposed

by the Licensee.

In the event of conflict, the information in Amendment Application No. 126 supersedes the information previously submitted.

Based on the safety analysis provided in the Description of Proposed Change and Safety Evaluation, it is concluded that (1) the proposed changes do not involve an unreviewed safety question as defined in 10 CFR 50.59, nor do they present significant hazards considerations not described or implicit in the Final Safety Analysis, and (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change.

A fee of \$150 is remitted herewith as required by 10 CFR 170.12.

DESCRIPTION OF PROPOSED CHANGE NO. 147 AND SAFETY EVALUATION

This is a request to revise Appendix A Technical Specifications 1.0, Definitions, and 4.4, Emergency Power System Periodic Testing.

Description

Reference I below requested Southern California Edison to submit Technical Specification changes for San Onofre Unit I to accomplish the following:

- a) Emergency diesel engine load shall not exceed 4500 kW \pm 5% for engine testing and emergency service requirements.
- b) Monthly diesel engine surveillance testing will not include "fast starts," but rather "slow starts." The refueling interval "fast start" test which simulates design basis service requirements should be retained.

The basis for this NRC request is described in Reference 1 below.

Proposed Change No. 147 will incorporate all of the NRC's recommended changes in the Technical Specifications, except the part which concerns engine load during emergency service, which will be addressed by changes to the San Onofre Unit 1 Emergency Operating Instructions. Additionally, Proposed Change No. 147 will accomplish the following:

- In Technical Specification (TS) 4.4.F.2., delete item (d), which requires that as part of the SISLOP test the diesel generators be run for ≥ 60 minutes at ≥ 4422 kw load. This requirement was originally proposed by the licensee as part of Proposed Change No. 47 (Amendment No. 53), which was approved and issued by the NRC with some additional changes as Amendment No. 25 (Reference 2 below). However, item (d) is considered superfluous in view of item (b) of TS 4.4.F.2, which verifies the capability of the diesel to automatically take on emergency loads and then run for ≥ 5 minutes. Whereas item (b) is consistent with the current Westinghouse Standard TS, item (d) is considered not necessary.
- 2. In TS 4.4.B.l and TS 4.4.F.2, specify that the monthly surveillance and refueling interval test starts shall be from "standby conditions", rather than "ambient conditions". The latter term is considered misleading for a diesel generator system that is normally maintained above ambient temperature.
- References: 1) Letter D. M. Crutchfield (NRC) to K. P. Baskin (SCE), dated November 19, 1984, TDI Diesel Engine Reliability and Operability
 - 2) Letter V. Stello (NRC) to J. B. Moore (SCE), dated April 1, 1977, Amendment No. 25 to Provisional Operating License No. DPR-13

Existing Technical Specifications

As contained in Enclosure I.

Proposed Technical Specifications

As contained in Enclosure II.

Safety Evaluation

Proposed Change No. 147 is deemed not to constitute a significant hazards consideration based on the following review questions and responses.

1. Question 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 (see explanation below)

2. Question 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 (see explanation below)

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

Response No (see explanation below)

Proposed Change No. 147 will ensure that loading of the diesel generators for monthly surveillance tests and refueling interval tests is realistic and not excessive, and unnecessary fast test starts are avoided. These changes will minimize mechanical stress and wear of the engine components and therefore prolong engine life. Proposed Change No. 147 will not significantly impact the effectiveness of surveillance testing and refueling interval testing, nor will it reduce the frequencies of any of these tests, nor impact the current availability of the diesel generators in all modes of plant operation. In light of these considerations, Proposed Change No. 147 will enhance plant safety, without adversely affecting the probability or consequences of a new or a previously evaluated accident.

Safety and Significant Hazards Consideration Determination

Based on the Safety Evaluation, it is concluded that: (1) Proposed Change No. 147 does not involve a significant hazards consideration as defined by 10 CFR 59.92; (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 Environmental Impact Statement.