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, Possess, and Use a Utilization Facility as Part of Unit No. 1 of the San Onofre Nuclear Generating Station	)	DOCKET NO. 50-206 Amendment Application No. 130

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY, pursuant to 10 CFR 50.90, hereby submit Amendment No. 130.

This amendment consists of Proposed Change No. 149 to the Technical Specifications incorporated in Provisional Operating License No. DPR-13 as Appendices A and B.

Proposed Change No. 149 would revise Technical Specification 3.6.2, "Containment Isolation Valves" and associated Table 3.6.2-1, "Power Operated or Automatic Containment Isolation Valve Summary." This proposed change will revise Table 3.6.2-1 to incorporate plant modifications involving addition of containment isolation valves for new containment penetrations and removal of two isolation valves for a penetration which is no longer in service. Further, this proposed change will make editorial changes to clarify and simplify the existing Specification 3.6.2 and Table 3.6.2-1.

In the event of conflict, the information in Amendment Application No. 130 supersedes the information previously submitted.

Based on the safety analysis provided in the Description of Proposed Change and Safety Analysis, it is concluded that (1) this proposed change does not involve an unreviewed safety question as defined in 10 CFR 50.59, nor does it 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.

Pursuant to 10 CFR 170.12, as revised in 49 FR 21293 dated May 21, 1984, the review of the Proposed Change contained in Amendment Application No. 130 has been determined to require a fee of $150.00. The fee of $150.00 is herewith remitted.

Subscribed on this 9th day of May 1985

Respectfully submitted,
SOUTHERN CALIFORNIA EDISON COMPANY

By Kenneth P Baskin
Kenneth P. Baskin
Vice President

Subscribed and sworn to before me this
9th day of May 1985.

C. Sally Sebo
Notary Public in and for the County of
Los Angeles, State of California

My Commission Expires: Apr 14, 1986

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My comm. expires APR 14, 1986

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By James A. Beoletto
James A. Beoletto

Subscribed on this 8 day of MAY, 1985.

Respectfully submitted,
SAN DIEGO GAS & ELECTRIC COMPANY

By _____
J. C. Holcombe
Vice President

Subscribed and sworn to before me this
8th day of May 1985.

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

My Commission Expires: 4/6/85

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By _____
David R. Pigott

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 No. 130 was served on the following by deposit in the United States Mail, postage prepaid, on the 9th day of May, 1985.

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DESCRIPTION OF PROPOSED CHANGE DPR-13-149
AND SAFETY ANALYSIS

This is a request to revise Technical Specification 3.6.2, Containment Isolation Valves and Technical Specification Table 3.6.2-1, Power Operated or Automatic Containment Isolation Valve Summary.

Existing Specification:

See Attachment A

Proposed Specification:

See Attachment B

Description

The proposed change would revise Technical Specification 3.6.2, Containment Isolation Valves and associated Table 3.6.2-1, Power Operated or Automatic Containment Isolation Valve Summary. Technical Specification 3.6.2 requires operability of the containment isolation valves listed in Technical Specification Table 3.6.2-1, in order to assure that the containment atmosphere would be isolated from the outside atmosphere in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analysis for a Loss Of Coolant Accident. The Technical Specification also provides that in the event any of the valves listed in Table 3.6.2-1 are inoperable, operation may continue provided that the containment isolation safety function is satisfied and cannot be affected by the failure of remaining operable containment isolation valve(s) associated with the affected penetration. Technical Specification 3.6.2 satisfies this criteria by permitting operation to continue provided that each penetration affected by an inoperable valve be isolated by at least one deactivated valve secured in the closed position, or that the affected penetration be isolated by at least one closed manual valve or a blind flange. Because the provisions of General Technical Specification 3.0.4 are not excepted in the present Technical Specification 3.6.2, a unit cannot be started up following a mode reduction while an inoperable valve is secured closed as allowed by Technical Specification 3.6.2 action requirements.

The proposed change to Technical Specification 3.6.2 consists of four parts as follows:

1. The proposed change would revise the page format for consistency with other Technical Specification changes. This change is editorial in nature.

2. Action A would be revised to clarify the applicability of required actions in the event of inoperability of a closed system containment penetration that is open and is provided with only one isolation valve. The existing Action is interpreted to require entry into Technical Specification General Limiting Condition for Operation 3.0.3 because the

existing Action cannot be satisfied (i.e., the penetration is open and there is no redundant isolation valve to maintain OPERABLE). Applying Specification 3.0.3 in such cases would require that either the inoperable valve be closed or that unit shutdown be initiated within one hour. Application of a one hour time limit to complete the required action for a closed system penetration is inconsistent with the intent of the existing specification. The intent of the existing specification is to maintain containment isolation valves operable, thereby maintaining containment integrity in the containment penetrations. It would be inconsistent to impose a more restrictive time limit to complete required actions for penetrations which only have one containment isolation valve, if a single isolation valve will satisfy the General Design Criteria (GDC) requirements. In accordance with 10 CFR 50, Appendix A, Criterion 57, closed system containment penetrations require only one containment isolation valve. Since all of the penetrations listed in Table 3.6.2-1 with only one containment isolation valve are closed systems inside containment (with the exception of the sphere purge air supply/exhaust penetrations which are sealed closed) the single isolation valve provided will satisfy the GDC requirements. Therefore, Action A would be revised to stipulate only in those instances where a second isolation valve exists to maintain at least one valve OPERABLE.

3. The proposed change would add a specific exemption to Technical Specification 3.0.4 enabling unit startup with inoperable containment isolation valves under certain specified conditions. The proposed conditions under which the unit may be started up with an inoperable containment isolation valve are that within four hours, the affected penetration is isolated by a secured closed automatic isolation valve, closed manual valve, or blind flange. These provisions will ensure that the purpose of the containment isolation valve (i.e., provide isolation for the containment penetration) is satisfied. The proposed condition further requires that the system with an inoperable containment isolation valve be declared inoperable and that applicable action requirements for that system be satisfied. Similar Technical Specification 3.0.4 exemptions for containment isolation valve inoperability have been previously approved for the Susquehanna, Bryon, and Limerick nuclear power plants.

4. The existing specification does not permit a deactivated power operated valve, which is secured closed in compliance with the Action Statements, to be reactivated in Modes 1, 2, 3, and 4. The proposed change would permit temporary reactivation under administrative control for circumstances which tend to enhance operational safety. These circumstances include verification of valve position for those types of valves requiring activation for position indication, and to perform valve testing which would lead to restoring the valve to an operable condition or demonstrating its operability.

The proposed changes to Technical Specification Table 3.6.2-1 would revise the valve summary to reflect editorial and design changes as described below.

1. The title of Table 3.6.2-1 would be changed to reflect the fact that the power operated containment isolation valves have Remote Manual (RM) controls. Consistent with the title change, the double asterisked (**) footnote would be deleted and each remote manual valve would be annotated "RM" instead of the double asterick. This change is editorial in nature.

2. All references to "Alignment" (e.g., source of electrical control and operating power) would be deleted. As indicated in the reference letter cited in Specification 3.6.2, a table of containment isolation valves which reflect diverse isolation signals should be developed and included in the Technical Specifications. In development of this table, it was our intention to include valve "Alignment" to illustrate electrical separation of control and operating power. These references have no bearing on the operability requirements of containment isolation valves. In accordance with the desires of the reference letter, diverse isolation signals are illustrated in Technical Specification Table 3.5.5-1. These diverse signals include manual initiation, containment pressure-high, sequencer subchannels and safety injection. In addition to these signals, the purge and exhaust isolation valves include a high containment radioactivity isolation signal. Accordingly, it is our desire to remove references to "Alignment" for simplification of Table 3.6.2-1 based on the irrelevance of this information to the objective of Specification 3.6.2. Consistent with this deletion, the astericked (*) footnote would be deleted.

3. This proposed change would delete references to solenoid valves which control the compressed air to pneumatically operated containment isolation valves. These solenoid valves relate to actuation of the containment isolation valves and were included in Table 3.6.2-1 for information purposes only. The inclusion of these solenoid valves in Table 3.6.2-1 has no bearing on the operability requirements of containment isolation valves. Accordingly, this change is considered editorial in nature.

4. Item 17, the Pressurizer Relief Tank Gas Sample penetration has been removed from service by installation of a pipe cap inside the penetration to provide containment integrity. The penetration is also capped outside of containment. Valves CV-948 and CV-949 no longer provide a containment isolation function. This proposed change would delete the present item 17 to reflect the present design.

5. This proposed change would add a new item 17 which reflects the addition of a hydrogen calibration gas penetration which is isolated by two automatic containment isolation valves (SV-3004 and SV-2004).

6. Item 18 would be changed by the addition of an outboard containment isolation valve (SV-3302) to the Reactor Coolant Loop Sample penetration. The additional outboard containment isolation valve permits post accident sampling of the reactor coolant without contaminating the reactor sampling system with potentially highly contaminated reactor coolant.

7. The triple asterisk (***) associated with items 20 and 21 will now be designated as a single asterisk (*). Also, the footnote has been revised for simplification to remove the objective portion of the requirement imposed by the footnote. This informaion is unessential to the footnote objective and was provided for additional clarification only. Adequate clarification of the footnote is provided in the Technical Specification Basis and need not be included in Table 3.6.2-1.

8. Item 29 would add a new Reactor Coolant Sample Return penetration in order to permit returning potential highly contaminated reactor coolant to the containment sump. This added penetration is isolated by an automatic containment isolation valve outside of containment (SV-3303) and an inside check valve.

Safety Analysis:

The proposed changes discussed above shall be deemed to involve a significant hazards consideration if there is a positive finding in any one of the following areas:

1. Will operation of the facililty in accordance with these proposed changes involve a significant increase in the probability or consequencs of an accident previosuly evaluated?

   Response: No

   a. The proposed changes to Technical Specification 3.6.2, including title change, revision of the specification format and elimination of instrument air control solenoids are editorial in nature and do not change facility operation.

   b. Clarification of Action A will allow a four hour time limit to complete the required actions in the event of inoperability of a closed system containment penetration that is open and is provided with only one isolation valve. Since closed system containment penetrations only require one isolation valve per 10 CFR 50 General Design Criteria requirements, the time limits imposed to complete the required actions for these systems should be consistent with the time limits imposed on penetrations requiring redundant isolation valves. Accordingly, this proposed change will clarify the intent of the existing action requirements for those instances where only one isolation valve is provided. Consistent with this clarification, this proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

c. The addition of the Technical Specification 3.0.4 exemption to Technical Specification 3.6.2 does not increase the probability or consequence of an accident previously evaluated. As revised, the Action requirement continues to assure containment isolation and also continues to assure that required systems satisfy their Limiting Condition for Operation.

d. Temporary reactivitation of deactivated power operated valves will allow the necessary flexibility to conduct (1) surveillance which may be essential for verification that the appropriate Action Statements have been satisfied, and (2) valve testing which would be a prerequisite to returning the valve to OPERABLE status. Both of these goals tend to enhance operational safety. Since this work will be conducted under administrative controls established by the Technical Specifications, this change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

e. The proposed change concerning deletion of control and operating power "alignment" information involves removal of extraneous information from Table 3.6.2-1 not pertinent to the operability requirements of containment isolation valves. Therefore, removal of this information will not involve a significant increase in the probability or consequences of an accident previously evaluated.

f. Changes to delete valves from inactive and sealed containment penetrations and add containment isolation valves to containment penetrations are proposed herein to reflect the present plant configuration. These changes will necessitate Technical Specification operability requirements for new isolation valves and eliminate requirements for inactive and sealed containment penetrations. These provisions will ensure appropriate operability requirements are maintained for the containment isolation system, thereby ensuring that there will be no significant increase in the probability or consequences from an accident previously evaluated.

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

Response: No

The proposed changes reflect the as-built containment isolation provisions in the plant, as well as the proposed elimination of the automatic Containment Isolation Actuation Signal to the steam generator sample lines. As revised, the containment isolation valve listing will conform with the present plant configuration. This conformance will ensure proper operability requirements are maintained, and the containment isolation system will perform its intended safety function. Based on these considerations, the evaluations in the FSA are not impacted by the proposed changes. Therefore operation of the facility in accordance with the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No

The margin of safety established by the existing Technical Specifications will not be reduced by the proposed changes. The revisions will ensure the operability of the containment isolation system by incorporating operability requirements on all remote manual and automatic containment isolation valves. Therefore, operation of the facility in accordance with these proposed changes will not involve a significant reduction in a margin of safety.

Safety and Significant Hazards Consideration 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; 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 Statement.

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Attachment A

EXISTING TECHNICAL SPECIFICATION 3.6.2

3.6.2 CONTAINMENT ISOLATION VALVES

APPLICABILITY: Applies to the containment isolation valves listed in Table 3.6.2-1 for MODES 1, 2, 3 and 4.

OBJECTIVE: To provide assurance that containment isolation will function when initiated by appropriate sensors.

SPECIFICATION:

A. The containment isolation valves specified in Table 3.6.2-1 shall be OPERABLE.

B. With one or more of the isolation valve(s) specified in Table 3.6.2-1 inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and either: 64 12/16/8

1. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or

2. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or

3. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange, or

4. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

BASIS: The OPERABILITY of the containment isolation valves ensures that the containment atmosphere be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

The isolation valves of the Sphere Purge Air Supply and Air Outlet lines have not been demonstrated capable of closure under the differential pressures generated by a design basis accident. For this reason, containment isolation in these lines shall be maintained. This configuration shall be accomplished by locking closed manual isolation valves CVS-301 and CVS-313 of these lines. These valves shall remain locked closed during MODES 1, 2, 3, and 4 until they can be demonstrated capable of performing their containment isolation function under post accident conditions. 75 2/17/8

References: (1) NRC letter dated July 2, 1980, from D. G. Eisenhut to all pressurized water reactor licensees.

TABLE 3.6.2-1

POWER OPERATED OR AUTOMATIC CONTAINMENT ISOLATION VALVE SUMMARY

	DESCRIPTION	INSIDE SPHERE	ALIGNMENT*	OUTSIDE SPHERE	ALIGNMENT*
1.	Sphere Sump Discharge	CV-102 (SV-108)	B	CV-103 (SV-109)	A
2.	RCS Dr Tk Discharge	CV-104 (SV-110)	B	CV-105 (SV-111)	A
3.	RCS Dr Tk Vent	CV-106 (SV-112)	B	CV-107 (SV-113)	A
4.	N_2 to RCS Drain Tank and PRT	CV-536	A	CV-535	B
5.	ORMS 1211/1212 Sphere Sample Supply	CV-147 (SV-1212-7)	B	SV-1212-9	A
6.	ORMS 1211/1212 Sphere Sample Return	CV-146 (SV-1212-6)	B	SV-1212-8	A
7.	A Stm. Gen. Stm. Sample	None		SV-119	A
8.	B Stm. Gen. Stm. Sample	None		SV-120	A
9.	C Stm. Gen. Stm. Sample	None		SV-121	A
10.	A Stm. Gen. Blowdown Sample	None		SV-123	A
11.	B Stm. Gen. Blowdown Sample	None		SV-122	A
12.	C Stm. Gen. Blowdown Sample	None		SV-124	A
13	Service Water to Sphere	CV-537	A	CV-115 (SV-126)	B
14.	Service Air to Sphere	Check Valve		SV-125	A
15.	SI Loop C Vent	SV-702B	A	SV-702A	B
16.	SI Loop B Vent	SV-702D	A	SV-702C	B
17.	PRT Gas Sample	CV-948**	A	CV-949 (SV-949)	B
18.	RC Loop Sample	(CV-955, CV-956, CV-962)**	A	CV-957 (SV-957)	B
19.	Pressurizer Sample	(CV-951, CV-953)**	A	CV-992 (SV-992)	B
20.	Sphere Purge Air Supply ***	-		POV-9 (SV-29)	A
21.	Sphere Purge Air Outlet ***	-		POV-10 (SV-30)	A
22.	Sphere Equalizing/Sphere Vent	CV-116 (SV-27)	B	CV-10 (SV-28)	A
	Inst. Air Vent	CV-40 (SV-19)	B		
23.	Primary Makeup to Press Rlf. Tk.	CV-533	A	CV-534	B
24.	Cont. Cooling Out	-	-	CV-515**	A
25.	Cont. Cooling In	-	-	CV-516**	B
26.	N_2 Supply to PORV	Check Valve	-	CV-532**	B
27.	Letdown	CV-525**	A	CV-526**	B
28.	Seal Water Return	CV-527**	A	CV-528**	B

* Logic Nest C, Train A is aligned to power train F; Logic Nest D, Train B is aligned to power train G.

** These valves do not receive an automatic containment isolation signal. They are operated by remote manual switch (RMS).

*** Manual valves CVS-301 and CVS-313 of the Sphere Purge Air Supply and Air Outlet lines, respectively, shall be locked closed during MODES 1, 2, 3, and 4 in order to ensure that the containment purge lines maintain containment isolation.

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Revised: 3/7/84
Type Revision: 3/15/84

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2/17/84