

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 Application No. 135
Generating Station)

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC
COMPANY, pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 135.

This amendment consists of Proposed Change No. 160 to Provisional
Operating License No. DPR-13. Proposed Change No. 160 modifies the Technical
Specifications incorporated into Provisional Operating License No. DPR-13 as
Appendix A.

Proposed Change No. 160 is a request to revise Section 4.10,
Augmented Inservice Inspection of High Energy Lines Outside Containment, to
allow consistent application of inspection techniques on a plant wide basis.

In the event of conflict, the information in Amendment Application
No. 135 supersedes the information previously submitted.

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PDR

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 fee of \$150.00 is herewith remitted.

MJT:6394F

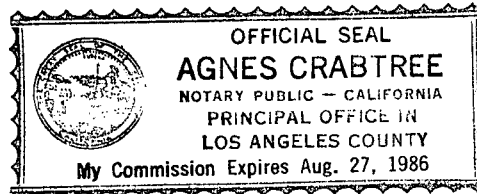
Subscribed on this 28th day of March 1986.

Respectfully submitted,
SOUTHERN CALIFORNIA EDISON COMPANY

By

Lawrence T. Papay
Lawrence T. Papay
Senior Vice President

Subscribed and sworn to before me this
28th day of March 1986.



Agnes Crabtree
Notary Public in and for the County of
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By

Charles R. Kocher
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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. 135 was served on the following by deposit in the United States Mail, postage prepaid, on the 28th day of March, 1986.

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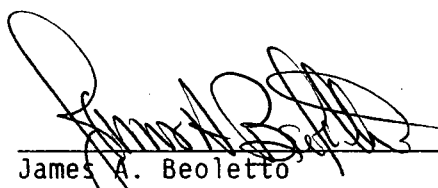
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DESCRIPTION AND SAFETY ANALYSIS OF
PROPOSED CHANGE NO. 160 TO THE TECHNICAL SPECIFICATIONS
PROVISIONAL OPERATING LICENSE DPR-13

This is a request to revise Section 4.10, "Augmented Inservice Inspection of High Energy Lines Outside Containment" of the Appendix A Technical Specifications for San Onofre Nuclear Generating Station, Unit 1.

DESCRIPTION

Technical Specification 4.10 delineates surveillance requirements for high energy fluid piping systems outside primary containment to monitor the continuing integrity of these systems. Periodic inservice inspection (ISI) of these piping systems provides a means for timely detection of flaws prior to failure of the piping. This inspection program, henceforth referred to as the augmented ISI, is performed in areas where safety systems are not protected from any postulated breaks in the high energy fluid piping systems outside containment. A more comprehensive program, henceforth referred to as the overall ISI, establishes surveillance requirements for all Class 1, 2 and 3 pressure retaining components and their supports and is provided by Technical Specification 4.7, Inservice Inspection Requirements.

The purpose of this proposed change is to request a modification to Specification 4.10 to allow revision of the augmented ISI schedule to be consistent with that of the overall ISI as delineated by Specification 4.7. This revision will allow the consistent application of ISI techniques on a plant wide basis.

The existing Specification 4.10 part A.(2).b requires that the augmented ISI be conducted during successive 3-1/3 year periods (40 months) and shall be updated to comply, to the extent practical, with the requirements in editions of Section XI of the ASME Code and Addenda in effect no more than six months prior to the start of each 40 month period, with due consideration given to physical access. Accordingly, Specification 4.10 requires that we, at present, use the 1980 Edition through 1981 Winter Addenda of Section XI of the ASME Code, henceforth referred to as the 1980 Edition, on the limited scope of structures and components noted above. The overall ISI program, however is based on the 1974 Edition through 1975 Summer Addenda of Section XI of the ASME Code, henceforth referred to as the 1974 Edition. In basing overall ISI surveillances on the 1974 Edition, there is an inconsistency of Section XI Editions that the two specifications for the augmented and overall ISI programs base their respective testing requirements.

The program that San Onofre Unit 1 currently implements for augmented ISI of high energy lines outside of containment specifies that welds in these lines be 100% volumetrically inspected. Application of the 1980 Edition would instead require that we perform a volumetric inspection of the inner one-third of the weld and perform a surface examination of the weld to be inspected.

Implementation of this inspection technique in lieu of the inspection technique currently used at San Onofre Unit 1 (i.e., as specified by the 1974 Edition) would involve considerably more man-hours and man-rem due to the surface preparation requirements. The 1980 Edition apparently recognizes the additional man-hours associated with the revised inspection technique and allows a corresponding decrease in the number of welds to be included in the inspection scope. However, for the augmented ISI program, the number of welds to be included in the inspection scope is fixed by the requirements of Specification 4.10. For this reason and to maintain consistent application of ISI techniques on a plant wide basis, it is our desire to revise Specification 4.10 to allow continued application of the 1974 Edition. In accordance with these desires, this proposed change requests to revise Specification 4.10 as shown in Attachment 2. The proposed revision states the augmented ISI program shall be conducted in accordance with the edition and addenda as required by Technical Specification 4.7. In doing so, Specification 4.10 will require revision of the augmented ISI program on a 120 month schedule and will allow continued application of the 1974 Edition.

EXISTING TECHNICAL SPECIFICATIONS

See Attachment 1

PROPOSED TECHNICAL SPECIFICATIONS

See Attachment 2

SAFETY EVALUATION

The proposed change discussed above shall be deemed to constitute a significant hazard consideration if positive findings are made in any of the following areas:

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

This proposed change modifies the technical specifications for the augmented inservice inspection (ISI) of specific high energy lines outside containment to be consistent with the overall ISI program. The acceptability of consequences for the spectrum of accidents associated with the overall ISI program ensures that consistent application of ISI techniques will provide early detection of flaws and continued structural integrity of high energy lines. Therefore, it is concluded that operation of the facility in accordance with this proposed change will not involve a significant 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

This proposed change will modify the technical specifications to require revision of the augmented ISI program on a 120 month schedule, consistent with the remainder of the ISI program. It has been previously determined that the overall ISI program is appropriate for early detection of flaws in high energy lines. Further, this proposed change will allow continued application of an inspection technique currently being used at San Onofre Unit 1. Therefore, it is concluded that operation of the facility in accordance with this proposed change 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 this proposed change involve a significant reduction in a margin of safety?

Response: No

This proposed change will allow revision of the augmented ISI program on an appropriate schedule. The revised schedule will be consistent with the overall ISI program and will ensure continued structural integrity of the effected piping systems over their service lifetime. This change will not involve a revision to the frequency at which inservice inspections are performed nor will it revise the current inspection technique. Based on these considerations, this change will not impact the margin of safety of this technical specification as defined by the ability to detect a potential flaw in a timely manner. Therefore, it is concluded that operation of the facility in accordance with this proposed change will not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. The proposed change to the contents of the specifications is most similar to example (vii) related to a change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations.

SAFETY AND SIGNIFICANT HAZARDS DETERMINATION

Based on the safety evaluation, it is concluded that: (1) the proposed change does not involve 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.

Attachment 1 - Existing Specifications

Attachment 2 - Proposed Specifications

MJT:6126F

ATTACHMENT 1

4.10 AUGMENTED INSERVICE INSPECTION OF HIGH ENERGY LINES OUTSIDE CONTAINMENT

APPLICABILITY: Applies to welds in piping systems or portions of systems located outside containment where protection from the consequences of postulated pipe breaks is not provided by a system of pipe whip restraints, protective enclosures, or other measures specifically designed to cope with such breaks.

OBJECTIVE: To provide assurance of the continued integrity of the piping systems over their service lifetime.

SPECIFICATION:

A. For the welds in the main steam, main feedwater, and first point extraction lines identified in Reference 1, Table 1 and Table 1A, Column: "Break Point Location", for which inservice inspection is specified in Column: "Solution":

- (1) At refueling outage No. 4, a baseline inspection consisting of a volumetric examination of all specified welds shall be performed in accordance with the requirements of ASME Section XI Code, "Inservice Inspection of Nuclear Reactor Coolant Systems" 1971, up to and including 1972 addenda.
- (2) Subsequent to the baseline examination, the inservice inspection of each weld shall be performed in accordance with the requirements of ASME Section XI Code, "Inservice Inspection of Nuclear Reactor Coolant Systems" 1971, up to and including 1972 addenda, with the following schedule:
 - (a) During the first 3-1/3 years (or nearest refueling outage), volumetric examination of 100% all welds.
 - (b) Every 10 years thereafter (or nearest refueling outage), volumetric examination of 33-1/3% of the welds at the expiration of each 1/3 of the inspection interval with a cumulative 100% coverage of all welds every 10 years.

NOTE: The welds selected during each inspection period shall be distributed among the total number to be examined to provide a representative sampling of the conditions of all specified welds.

The inservice examinations conducted during successive 3-1/3 year periods (40 months) shall be updated to comply to the extent practical with the requirements in editions of ASME Section XI Code and addenda in effect no more than six months prior to the start of each 40-month period, with due consideration given to physical access.

- (3) Any evidence revealed by the examinations specified in (1) or (2) that indications have developed or grown shall be investigated, including evaluation of comparable areas of the applicable system. It may be determined that the condition can be tolerated or that repair is necessary. In the event that repair is required, restoration shall be governed by the original acceptance standards.
 - (4) In the event repair of any weld is required following an examination, the inspection schedule for the repaired weld will be changed to provide for its inspection at the following inspection.
- B. For all welds in the main steam lines, main feedwater lines, and first point extraction lines located outside containment:
- (1) A visual inspection of the surface at the insulation joints nearest to all weld locations shall be performed on a monthly basis for detection of leaks. Any detected leaks shall be investigated and evaluated. If the leakage is caused by a through-wall flaw, either the plant shall be shut down or the leaking piping isolated. Repairs shall be performed prior to return of this line to service.

BASIS:

Under normal plant operating conditions, the piping materials operate under ductile conditions and within stress limits considerably below the ultimate strength properties of the materials. Flaws which could grow under such conditions are generally associated with cyclic loads which fatigue the metal and lead to cracks. The inservice examination and the frequency of inspection will provide a means for timely detection before the flaw penetrates the wall of the piping.

Reference:

- (1) Report on the Effects of a Piping System Break Outside the Containment, December 1973, including November 1974 Addendum 1, and May 1975 Addendum 2.

ATTACHMENT 2