

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. 141
Generating Station)

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC
COMPANY, pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 141.

This amendment consists of Proposed Change Nos. 167 and 175 to
Provisional Operating License No. DPR-13. Proposed Change Nos. 167 and 175
modify the Technical Specifications incorporated in Provisional Operating
License No. DPR-13 as Appendix A.

Proposed Change No. 167 is a request to revise Technical
Specification Section 4.11, Control Room Emergency Air Treatment System, of
Appendix A. The changes are proposed to more closely model the surveillance
standards with the performance of the control room emergency air treatment
system, to reflect planned upgrades to the unit and to ensure consistency with
current regulatory guidance in the area of charcoal testing.

Proposed Change No. 175 is a request to revise Technical Specification Section 4.1.6, Pressurizer Relief Valves, of Appendix A. The proposed change would allow for the suspension of the PORV Block Valve surveillance standard during periods when the block valve is being maintained in the closed position in accordance with the action statement provisions of Appendix A Technical Specification Section 3.1.5.

In the event of conflict, the information in Amendment Application No. 141 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) the 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, the fee of \$150 is herewith remitted.

Subscribed on this 27th day of May, 1987.

Respectfully submitted,
SOUTHERN CALIFORNIA EDISON COMPANY

By: /S/ Kenneth P. Baskin
Kenneth P. Baskin
Vice President

Subscribed and sworn to before me this
27th day of May, 1987.

/S/ Agnes Crabtree
Notary Public in and for the County of
Los Angeles, State of California

My Commission Expires: Sept. 14, 1990

Charles R. Kocher
James A. Beoletto
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By: /S/ James A. Beoletto
James A. Beoletto

Subscribed on this 4 day of May, 1987.

Respectfully submitted,
SAN DIEGO GAS & ELECTRIC COMPANY

By: /S/ J. C. Holcombe
J. C. Holcombe
Vice President

Subscribed and sworn to before me this
4th day of May, 1987.

/S/ Jill Quigley
Notary Public in and for the County of
San Diego, State of California

My Commission Expires: March 7, 1989.

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By: /S/ David R. Pigott
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 Application No. 141 was served on the following by deposit in the United States Mail, postage prepaid, on the 27th day of May, 1987.

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DESCRIPTION OF PROPOSED CHANGE AND SAFETY ANALYSIS OF
PROPOSED CHANGE NO. 167 TO THE TECHNICAL SPECIFICATIONS
PROVISIONAL OPERATING LICENSE DPR-13

This is a request to revise Section 4.11, "Control Room Emergency Air Treatment System" of Appendix A Technical Specifications for San Onofre Nuclear Generating Station, Unit 1.

DESCRIPTION

Technical Specification 4.11.B.(2) requires the results of a laboratory carbon sample analysis performed on an adsorbent sample from the control room HVAC to show $\geq 90\%$ radioactive methyl iodide removal. The construction of the control room HVAC charcoal adsorber does not have the capability for removal of a test canister; furthermore, obtaining a representative sample and performing a laboratory analysis cannot be carried out in a cost effective manner with respect to complete replacement. Current practice is therefore to replace the adsorbent with an adsorbent meeting the physical property requirements of ANSI N509-1976 Table 5-1 in accordance with Regulatory Guide 1.52. However, if the laboratory test option is chosen, the performance of the test should be in accordance with ASTM D-3803, 1979 and at the design residence time for the charcoal filter. In this way, the removal efficiency of the adsorbent is assured to be consistent with criteria established in the Final Safety Analysis and subsequent analyses.

Proposed Change No. 167 would revise Technical Specification 4.11.B.(2) to explicitly provide the option of replacing the charcoal adsorbent with an adsorbent meeting the physical property requirements of Regulatory Guide 1.52 in lieu of obtaining a representative sample for testing. This option is consistent with the existing basis of Section 4.11, Paragraph 2 (i.e., as specified in Section C.6.b of Regulatory Guide 1.52). Also, the required conditions of the laboratory sample analysis test would be revised to be in accordance with ASTM D-3803, 1979.

Proposed Change No. 167 would also revise Technical Specification 4.11.A to require that once per refueling cycle, the pressure drop across the combined HEPA filters and charcoal filters be demonstrated to be less than 1.8 inches of water. This more restrictive test requirement, which is based upon the revised design basis fan curve established as a result of NRC and SCE recent fan/filter design review activities, will provide greater assurance that these filter assemblies will not become clogged to a point that the fan performance would be degraded, potentially leading to control room pressurization problems. A change to the flow rate reference from \geq design flow rate to $\pm 10\%$ of the design flow rate. This change is considered to be a minor clarifying change for consistency with the flow rate test in 4.11.B.3 and to specify a maximum flow rate for this test.

Proposed Change No. 167 would also require that the system be operated at least 10 hours every month with the heaters on. This revision is necessary to update the technical specifications to be consistent with recent commitments regarding monthly operation and planned modifications to install duct heaters. This provision would become effective following installation of the heaters.

Finally, Proposed Change No. 167 would revise the basis of Technical Specification 4.11 to specifically define the physical property requirements necessary to maintain the required removal efficiencies. Other changes to the basis are also made for consistency with the changes made to the body of the technical specification. Minor changes to format and wording are made for consistency with the Standard Technical Specification format. Additionally, the reference to the effectivity of the specification is deleted since the field testing was previously completed.

EXISTING TECHNICAL SPECIFICATION

See Attachment 1

PROPOSED TECHNICAL SPECIFICATION

See Attachment 2

SAFETY EVALUATION

The proposed change as 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

The proposed change provides the option of replacing the adsorbent in lieu of verifying the component efficiency by laboratory analysis without jeopardizing the intent of Section 4.11.B.(2). The intent of Section 4.11.B.(2) in verifying the component efficiency is to assure the system will operate at a degree equal to or better than that assumed in the Final Safety Analysis and subsequent dose assessments. Replacing the adsorbent with a new adsorber which must meet the requirements of Table 5-1 of ANSI N509-1976 would thereby maintain the intent of Section 4.11.B.(2). The use of the ASTM D-3803, 1979 test procedure will assure that the laboratory charcoal test, if performed, is performed in a manner that will verify charcoal condition and will be performed at the design basis residence time. The additional restriction in the acceptance criteria for the filter(s) pressure drop test and modification of the fan flow rate specification will provide additional assurance of proper filter and fan performance. The increased monthly operation with the heaters on will serve to assure the design adsorbency of the charcoal filters. The remaining format and wording changes are administrative in nature and do not affect the actions to be performed. This proposed change does not hinder in any way the operation or availability of the control room emergency air system as it will only maintain or increase the present efficiency and availability of the system. Therefore it is concluded that this proposed change will not cause 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 does not alter or degrade in any way the current operation of the control room emergency air system. The option provided by this proposed change in Section 4.11.8.(2) is currently available within the basis of Section 4.11. The basis of Section 4.11 references Regulatory Guide 1.52 in addressing the physical property requirements of the adsorbent. In Position C.6.b. of Regulatory Guide 1.52 it is stated that the adsorbent is to be replaced if the representative sample fails to pass the required tests, or if a representative sample is not available for testing. The restriction of the filter pressure drop test acceptance criteria serves to establish a more appropriate test standard for verifying that the margin to clogged conditions, which could lead to fan failure, is adequately maintained. The more rigorous specification of the fan flow rate assures proper performance of the test. Therefore, the restriction of the filter drop test acceptance criteria and the fan flow rate specification actually reduces the possibility of a previously analyzed failure mode for this system. The new requirement to perform the monthly operation with the heaters on is a more restrictive requirement that will assure the charcoal is maintained in a ready state. The administrative change in wording and format does not alter the actions and consequently, does not create the possibility of a new or different type of accident from any accident previously evaluated. It can thus be concluded that 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

As explained in the responses to questions 1 and 2, this proposed change will maintain the intent of Section 4.11.B.(2), and will not alter or degrade in any way the current operation and availability of the control room emergency air system. This proposed change serves to maintain previously analyzed margins of safety. Therefore, it is concluded that this proposed change will not result in 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. Example (vii) related to a change to make a license conform to changes in the regulations where the license change results in a very minor change to facility operations clearly in keeping with the regulations. Regulatory guides are not regulations, but this particular example is the closest in similarity to this

particular revision. In this case, the practice of testing and replacing the charcoal adsorbent does not strictly comply with the guidance of Regulatory Guide 1.52, Revision 2, March, 1978, but it had complied with the NRC guidance at the time of issuance of this technical specification. The change proposed herein will make this section conform to the current guidance of Regulatory Guide 1.52.

The proposed changes to 4.11.A and C are most similar to example (ii) of 48 FR 14870, since they are additional limitations not presently included in the technical specifications. In this case the decrease in the filter pressure drop test acceptance criteria and the increased monthly unit operation time, with the newly installed heaters on, are more restrictive surveillance requirements.

The proposed changes to the format, to the basis and to the effectivity, are most similar to example (i) of 48 FR 14870 since it is a purely administrative change to achieve consistency throughout the Technical Specification. In this case, the physical property requirements necessary to maintain the required removal efficiencies are specifically defined in the basis consistent with Specification 4.11.B.(2), the reason for performing the pressure test is defined in the basis, and the conditional effectivity has been completed.

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 Specification Section 4.11

Attachment 2 - Proposed Specification Section 4.11

4.11 CONTROL ROOM EMERGENCY AIR TREATMENT SYSTEM

APPLICABILITY: Applies to the testing and surveillance of the control room emergency air treatment system to determine OPERABILITY.

OBJECTIVE: To ensure that the control room emergency air treatment system will operate effectively if required.

SPECIFICATION: The control room emergency air treatment system shall be demonstrated OPERABLE:

- A. At least once per refueling cycle, by verifying that the pressure drop across the combined HEPA filters and charcoal adsorbers is less than 1.8 inches of water while operating the system at a flow rate of 900 cfm \pm 10%.
- B. At least once per year for standby service or after every 720 hours of system operation and following significant painting, fire, or chemical release in any ventilation zone communicating with the system, by verifying that:
 - (1) In-place cold DOP and halogenated hydrocarbon tests on HEPA filters and charcoal adsorbers, at a system flow rate of 900 cfm \pm 10% show \geq 99% DOP removal and \geq 99% halogenated hydrocarbon removal when tested in accordance with ANSI N510-1975.
 - (2) The carbon adsorber is either replaced with an adsorbent meeting the physical property requirements of Table 5-1 of ANSI N509-1976, or a laboratory carbon sample analysis shows, within 31 days after removal, \geq 90% radioactive methyl iodide removal when tested in accordance with ASTM D-3803, 1979.
 - (3) A system flow rate of 900 cfm \pm 10% is shown when tested in accordance with ANSI N510-1975.
- C. At least once per 31 days by initiating, from the control room, flow through the HEPA filter and charcoal adsorbers and verifying that the system operates for at least 10 hours with the heater(s) on.
- D. After each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing by performing cold DOP testing. After each complete or partial replacement of the charcoal adsorbers or after any structural maintenance on the system housing by performing halogenated hydrocarbon testing.

- E. At least once per refueling cycle by demonstrating automatic closure of the fresh air intake to the control room.

BASIS:

Pressure drop across the combined HEPA filters and charcoal adsorbers of less than 1.8 inches of water at flow rates near design levels (900 cfm \pm 10%) indicates that the filters and adsorbers are not clogged by excessive amounts of foreign matter. Pressure drop is determined once per refueling cycle to verify system performance capability.

The frequency of tests and sample analysis are necessary to show that the HEPA filters and charcoal adsorbers can perform as evaluated. The tests are performed at a charcoal residence time consistent with the design of the filter unit (i.e. 1/8 second). The removal efficiencies stipulated are consistent with criteria established in the Final Safety Analysis and subsequent analyses; specifically, laboratory carbon test results shall meet the physical property requirements of Regulatory Guide 1.52 Table 2, and when applicable, all replaced adsorbent shall meet the physical property requirements of Table 5.1 of ANSI N509-1976 in conformance with Regulatory Position C.6.a. of Regulatory Guide 1.52. Any HEPA filters found defective should be replaced with filters qualified pursuant to Regulatory Position C.3.d. of Regulatory Guide 1.52.

Operation of the system for 10 hours every month with the heaters on will demonstrate operability of the system and serve to remove excessive moisture build-up on the adsorber.

Contaminants can be generated by painting, fire or chemical release. The fumes, chemicals or foreign materials produced could contaminate the filters or adsorbent if the release occurs in an area communicating with the system. Conducting the same tests as required at refueling intervals or following a significant release of contaminants in a communicating area, assures that system performance is not degraded.

DESCRIPTION OF PROPOSED CHANGE AND SAFETY ANALYSIS OF
PROPOSED CHANGE NO. 175 TO THE TECHNICAL SPECIFICATIONS
PROVISIONAL OPERATING LICENSE DPR-13

This is a request to revise Section 4.1.6, "Pressurizer Relief Valves" of Appendix A Technical Specifications for San Onofre Nuclear Generating Station, Unit 1.

DESCRIPTION

Technical Specification 4.1.6 currently requires that the PORV block valve be demonstrated OPERABLE every 92 days by operation through one complete cycle of full travel. However, as SCE discovered in recent SONGS-1 operation, this surveillance requirement has no provision for situations in which the PORV block valve is being maintained closed in accordance with the provisions of Specification 3.1.5.A. Such a provision is provided in the similar specification in NUREG-0452, Revision 4, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors." Proposed Change No. 175 would revise Specification 4.1.6 to include such a provision.

EXISTING TECHNICAL SPECIFICATIONS

See Attachment 1

PROPOSED TECHNICAL SPECIFICATION

See Attachment 2

SAFETY EVALUATION

The proposed change as 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

The proposed change inserts a provision to allow continued operation, without performing a PORV block valve surveillance test. This test exception would be allowed only if the PORV block valve(s) is/are being maintained closed in accordance with the provisions of Specification 3.1.5. The safety function of the PORV block valve(s) is to isolate an inoperable PORV from the primary system. During normal plant operation, the isolation may be necessary to mitigate primary system leakage that is occurring through the PORV or during an accident scenario, the isolation may be necessary to isolate a stuck open PORV. Therefore, opening the PORV block valve to perform a surveillance test would transgress the

safety function of the valve. Therefore, it is concluded that this proposed change will not cause 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

The failure of the PORV block valve(s) is a previously analyzed failure. In order to assure that failure of the PORV block valves does not preclude primary system relief via this pathway, the PORV block valves are designed to fail open. In order to minimize challenges to safety systems, the PORVs are designed to fail closed. Therefore, maintaining the PORV block valves in a closed position, without the performance of an operability test, is necessary to assure that failure of the PORV does not result in the release of primary coolant. Operation of the facility in the manner proposed herein will not alter these previously analyzed failures. It can thus be concluded that 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

As stated in the responses to questions 1 and 2, in this case, the PORV block valve(s) is being maintained closed to assure that an inoperable PORV does not cause a decrease in a margin of safety. This proposed change serves to ensure a previously analyzed margin of safety. Therefore, it is concluded that this proposed change will not result in 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. Example (vii) related to a change to make a license conform to changes in the regulations where the license change results in a very minor change to facility operations clearly in keeping with the regulations. The standard technical specifications (STS) are not regulations, but this particular example is the closest in similarity to this particular revision. In this case, the existing SONGS 1 technical specifications were written in accordance with the STS revision that was applicable when they were drafted. Since that time, the problem that SONGS 1 encountered has apparently been realized by the authors of the STS and an appropriate revision to NUREG-0452 has been made. The change proposed herein will make this section conform to the current guidance of NUREG-0452.

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 Specification Sections 3.1.5 and 4.1.6

Attachment 2 - Proposed Specification Section 4.1.6