



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 81 TO FACILITY OPERATING LICENSE NO. NPF-10  
AND AMENDMENT NO. 70 TO FACILITY OPERATING LICENSE NO. NPF-15

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NOS. 2 AND 3

DOCKET NOS. 50-361 AND 50-362

1.0 INTRODUCTION

By letter dated December 22, 1987, Southern California Edison Company et al. (the licensee) requested a change to the Technical Specifications for Facility Operating Licenses No. NPF-10 and No. NPF-15 that authorize operation of San Onofre Nuclear Generating Station, Unit Nos. 2 and 3, in San Diego County, California. The licensee proposed to revise the applicability of limiting conditions for operation and surveillance requirements (TS 3.0.4, TS 4.0.3, and TS 4.0.4) on the basis of Generic Letter 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications on the Applicability of Limiting Conditions for Operation and Surveillance Requirements." The proposed change would incorporate a provision in TS 3.0.4 allowing entry into an operational mode or specified condition in accordance with action requirements when conformance to them would permit continued operation for an unlimited period of time. It would add a provision in TS 4.0.3 allowing a delay for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of some applicable action requirements are less than 24 hours. It would also revise TS 4.0.4 to include a provision that would not prevent passage through or an operational mode as required to comply with action requirements. The proposed revision to the bases for all specifications in sections 3.0 and 4.0 would provide a better justification supporting their applicability.

As a result of discussions held between the licensee and the staff, the licensee modified the December 22, 1987 submittal by a letter dated October 19, 1989. The staff had indicated to the licensee that the recommended Generic Letter 87-09 changes to 3.0.4 could permit new exceptions to 3.0.4 that did not exist before, and would require additional plant specific justification. Therefore, in the October letter the

licensee withdrew those portions of PCN-238 that would revise TS 3.0.4 and the technical specification revisions that would delete the explicit exceptions to 3.0.4. The proposed changes to TS 4.0.3 and TS 4.0.4 and the revised bases for section 3.0 and 4.0 were retained.

## 2.0 EVALUATION

### Specification 4.0.3

In Generic Letter 87-09, the staff stated that it is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed, because the vast majority of surveillances demonstrate that systems or components are operable. Since the allowable outage time limits of some action requirements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements apply, the Technical Specifications should include a time limit that would allow a delay of the required actions to permit the performance of the missed surveillance.

This time limit should be based on considerations of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance. After reviewing possible limits, the staff concluded that, based on these considerations, 24 hours would be an acceptable time limit for completing a missed surveillance when the allowable outage times of the action requirements are less than this time limit or when shutdown action requirements apply. The 24 hour time limit would balance the risks associated with an allowance for completing the surveillance within this period, against the risks associated with the potential for a plant upset and challenge to safety systems (when the alternative is a shutdown to comply with action requirements before the surveillance can be completed).

This limit does not waive compliance with TS 4.0.3. Under TS 4.0.3, the failure to perform a surveillance requirement will continue to constitute noncompliance with the operability requirements of a limiting condition for operation. It will also cause the applicable action requirements to be manifest.

Therefore, based upon the above discussion, the staff concurs that the change to TS 4.0.3 is acceptable.

### Specification 4.0.4

TS 4.0.4 prohibits entry into an operational condition or other specified condition until all required surveillances have been performed. This could cause an interpretation problem when operational condition changes are required in order to comply with action statements. Specifically, two possible conflicts between TS 4.0.3 and 4.0.4 could exist.

The first conflict arises because TS 4.0.4 prohibits entry into an operational mode or other specified condition when surveillance requirements have not been performed within the specified surveillance interval. The licensee's proposed modification to resolve this conflict involves the revision to TS 4.0.3 to permit a delay of up to 24 hours in the application of the action requirements, as explained above, and a clarification of TS 4.0.4 to allow passage through or to operational modes as required to comply with action requirements.

The second potential conflict between TS 4.0.3 and 4.0.4 arises because an exception to the requirements of 4.0.4 is allowed when surveillance requirements can only be completed after entry into a mode or condition. However, after entry into this mode or condition, the requirements of TS 4.0.3 may not be met because the surveillance requirements may not have been performed within the allowable surveillance interval.

The licensee proposes to resolve these conflicts by providing the modification to TS 4.0.4. The staff has provided in Generic Letter 87-09 a clarification that: (a) it is not the intent of 4.0.3 that the action requirements preclude the performance of the surveillances allowed under any exception to TS 4.0.4; and (b) the delay of up to 24 hours in TS 4.0.3 for the applicability of action requirements provides an appropriate time limit for the completion of surveillance requirements that become applicable as a consequence of any exception to TS 4.0.4.

Therefore, based upon the above discussion, the staff concurs that the change to TS 4.0.4 is acceptable.

#### Section 3.0 and 4.0 Bases

The staff reviewed the proposed changes to the bases for TS sections 3.0 and 4.0. The staff finds that the proposed revision to the bases section for all specifications in TS 3.0 and 4.0 would provide a better justification supporting the applicability of the specifications in TS 3.0 and 4.0. Therefore, the staff concurs that the changes to the bases for TS sections 3.0 and 4.0 are acceptable.

#### 3.0 CONTACT WITH STATE OFFICIAL

The staff has advised the State Department of Health Services, State of California, of the proposed determination of no significant hazards consideration. No comments were received.

#### 4.0 ENVIRONMENTAL CONSIDERATION

The amendments involve changes in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or changes an inspection or surveillance requirement. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may



be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

#### 5.0 CONCLUSION

We have concluded, based on the considerations discussed above that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) such activities will be conducted in compliance with the Commission's regulations; and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: December 7, 1989