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SAN ONOFRE NUCLEAR GENERATING STATION

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STATION MANAGER

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February 26, 1993

Mr. John B. Martin
Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Subject: Docket No. 50-361
Request for Temporary Waiver of Compliance
Electrical Power Systems - D.C. Sources
San Onofre Nuclear Generating Station, Unit 2

Dear Mr. Martin:

The purpose of this letter is to provide written follow up to a verbal request for a temporary waiver of compliance from the requirements of Technical Specification (TS) 3.0.3 without fully complying with the requirements of TS 3.8.2, "Electrical Power Systems - D.C. Sources," for a period of four hours. Approval of this request was necessary to avoid an unwarranted shutdown of Unit 2 in order to restore one of the two inoperable 125 VDC full capacity chargers to an operable status.

Per telephone conversation with Mr. Ken Perkins (NRC- Region V Director, Division of Reactor Safety and Projects) verbal approval was granted at 8:30 pm PST for a temporary waiver of compliance for a period of four hours, commencing at 8:30 pm PST on February 25, 1993. The temporary waiver of compliance was terminated at 9:43 pm PST with the restoration of one inoperable 125 VDC full capacity charger to an operable status.

A. Requirements For Which The Waiver Is Requested:

TS 3.8.2, defines the operability requirements for the four Unit 2 125 VDC battery banks and their associated full capacity chargers. TS 3.8.2 requires, in part, "...with one of the required full capacity chargers inoperable,

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demonstrate the OPERABILITY of its associated battery bank by performing Surveillance Requirement 4.8.2.1.a.1 within one hour, and at least once per eight hours thereafter."

TS Surveillance Requirement 4.8.2.1.c.4 requires that, at least once per refueling interval, the battery charger be able to supply at least 300 amperes at 125 VDC for twelve hours in order to be considered operable.

TS 3.0.3 requires, in part, that when a limiting condition for operation is not met, except pursuant to associated ACTION requirements, a unit shutdown shall be initiated within one hour.

This temporary waiver of compliance was requested to allow an extension of the shutdown requirement of TS 3.0.3 for four hours since more than one charger was inoperable and we were required to follow this limiting condition for operation.

B. Circumstances Surrounding the Situation:

Units 2 and 3 each have four 125 VDC battery banks and four full capacity chargers (one charger for each battery bank). Each charger has six reactor balance cards. Following replacement of the cards for corrective maintenance it was discovered, during review of documents included with the replacement cards, that an August 28, 1989 10 CFR Part 21 notification, "C&D Battery Chargers," may be applicable to these cards and may affect the operability of the chargers. The 10 CFR Part 21 notification concerned the installation of the replacement reactor balance cards and the resulting potential to reduce the charger current limit. Based on our conversations with the charger vendor, previous experience with these cards, the minimum required safety function charging current, and differences between our charger and that described in the Part 21 report, we believed the battery chargers remained operable, although we could not have positive assurance without testing.

In order to confirm the operability of the chargers we decided to test the affected chargers. This test found the 2D1 charger current to be below the TS required minimum of 300 amperes but, at approximately 270 amperes, above the minimum current required to fulfill its safety function. Following vendor instructions, an adjustment of the current limiting resistor was made and the 2D1 charger current was increased to the current limit setting of 315 amperes. The charger was returned to service and the temporary waiver of compliance was terminated at 9:43 pm PST.

C. Compensatory Actions Necessary:

During the effective period of this waiver request, the following compensatory actions were taken:

- o The spare charger was connected to and remained on the battery bank while the 2D1 charger was being tested and adjusted.
- o The TS actions (TS 3.8.2.1, Action b) for increased battery surveillances on the affected battery banks were entered.

It should be noted that even though the redundant train charger (2D2) could not be confirmed to have full operability, it remained capable of performing the intended safety function.

D. Preliminary Evaluation of the Safety Significance of this Request:

The TS requirement for the affected battery chargers is to provide 300 amperes at 125 VDC for at least 12 hours. A review of the design basis calculation determined that a charger amperage of only 200 amperes is required in order for the chargers to meet their intended safety function. We have been assured by the vendor and by our experience that the worst case charging capacity with the configuration as it existed when installed would provide well in excess of 200 amperes. Therefore, there was no safety significance associated with this waiver request.

E. Justification for the Duration of the Waiver:

This temporary waiver of compliance was requested for a period of four hours commencing at 8:30 pm PST on February 25, 1993. This duration was determined to be the time required to restore charger 2D1 to operable status, with allowance for contingencies. (Although this condition affects both chargers 2D1 and 2D2, restoration of only one of the chargers is required, since TS 3.8.2 provides an action statement for the condition of only one full capacity charger being inoperable.)

F. Basis for No Significant Hazards Conclusion:

10 CFR 50.92 defines that no significant hazards will occur if operation of the facility in accordance with the temporary waiver of compliances does not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

Since charger 2D1 was above the minimum (based on calculation) 200 amperes current level, it would have provided its intended safety function. As discussed above, SCE had assurance from the vendor and our experience that the chargers had capacity well in excess of 200 amperes. As such, this request does not significantly increase the probability or consequences of an accident previously evaluated; nor create the possibility of a new or different kind of accident from any previously evaluated; nor does it represent a significant reduction in a margin of safety.

G. Basis for No Irreversible Environmental Consequences:

As this activity is confined to site boundaries, this temporary waiver of compliance involved no increase in the amounts, and no change in the types of any effluent that may be released offsite. There is also no increase in individual or cumulative occupational radiation exposure involved with this waiver. Accordingly, this temporary waiver of compliance meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 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 granting of the temporary waiver of compliance.

The San Onofre Nuclear Generating Station Onsite Review Committee has reviewed and approved this Request for Temporary Waiver of Compliance.

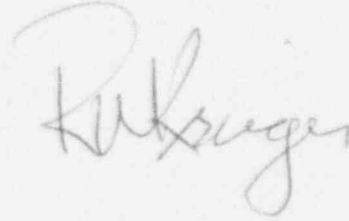
John B. Martin

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If you have any questions or comments, or if you would like additional information, please let me know.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. B. K. Rieger". The signature is written in dark ink and is positioned to the right of the typed name "Rieger".

cc: J. B. Martin, Regional Administrator, NRC Region V
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre
Units 1, 2 and 3