# UNITED STATES OF AMERICA

## NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, <u>ET AL</u>. for a Class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit 2 of the San Onofre Nuclear Generating Station Docket No. 50-361

Amendment Application No. 132

SOUTHERN CALIFORNIA EDISON COMPANY, <u>ET AL</u>. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 132.

This amendment application consists of proposed Technical Specification Change No. NPF-10-427 to Facility Operating License No. NPF-10. Proposed Technical Specification Change NPF-10-427 will revise Technical Specification 3/4.8.1, "A. C. Sources." This proposed change will provide a one-time exception from the OPERABILITY requirements of Unit 2 Surveillance Requirement 4.8.1.1.1.a, to allow for the Unit 3 480V transformer replacement during the Unit 3 Cycle 7 refueling outage.

9304150195 930413 PDR ADOCK 05000361 PDR PDR Subscribed on this 13th day of April \_\_\_\_, 1993.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Hamold B. Ray Senior Vice President

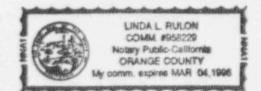
State of California

County of <del>Orange</del> San Diego

on <u>April 13, 1993</u> before me, <u>Linda L. Rulon</u>, personally appeared <u>Harold B. Ray</u>, personally known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

signature Linda J. Rulon



James A. Beoletto Attorney for Southern California Edison Company

By: James A. Beoletto

## UNITED STATES OF AMERICA

## NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, <u>ET AL</u>. for a Class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit 3 of the San Onofre Nuclear Generating Station Docket No. 50-362

Amendment Application No. 116

SOUTHERN CALIFORNIA EDISON COMPANY, <u>ET AL</u>. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 116.

This amendment application consists of proposed Technical Specification Change No. NPF-15-427 to Facility Operating License No. NPF-15. Proposed Technical Specification Change NPF-15-427 will revise Technical Specification 3/4.8.1, "A. C. Sources." This proposed change will provide a one-time exception from the OPERABILITY requirements of Unit 3 Surveillance Requirement 4.8.1.1.1.a, to allow for the Unit 2 480V transformer replacement during the Unit 2 Cycle 7 refueling outage. Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

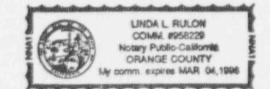
By: Harold B. Ray Senior Vice President

State of California County of Orange San Diego

On April 13, 1993 before me, Linda L. Rulon , personally appeared <u>Harold B. Ray</u>, personally known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature Linda S. Rulon



James A. Beoletto Attorney for Southern California Edison Company

By: James A. Beoletto

ENCLOSURE 1 PCN 427

TRANSFORMER REPLACEMENT

## DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGE NPF 10/15-427

This is a request to revise Technical Specification (TS) 3/4.8.1, "A. C. Sources," to allow a one-time exception for replacement of transformers BO4X and BO6X during the San Onofre Units 2 and 3 Cycle 7 refueling outages.

## Existing Specifications

Unit 2: Attachment "A" Unit 3: Attachment "B"

# Proposed Specifications

Unit 2: Attachment "C" Unit 3: Attachment "D"

### Description

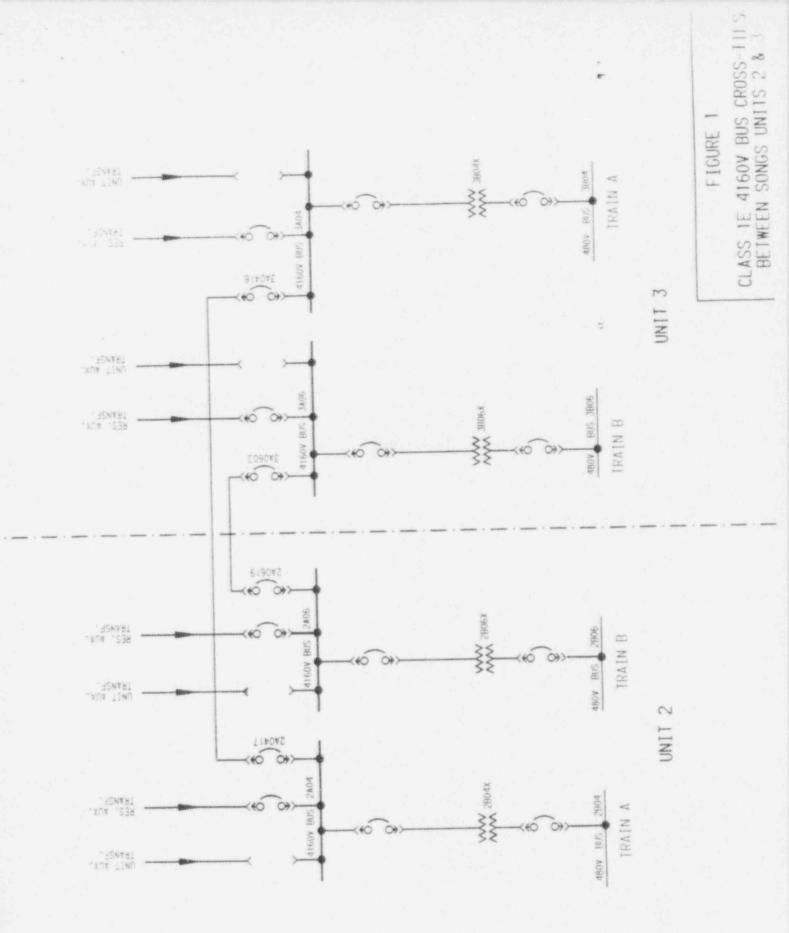
This proposed change requests a one-time exception to Technical Specification (TS) 3/4.8.1, "A. C. Sources," to allow for transformer replacement during the Units 2 and 3 Cycle 7 refueling outages.

TS 3.8.1.1 requires two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system to be OPERABLE during Modes 1 through 4 for Units 2 and 3. The primary independent A. C. circuit is through the reserve auxiliary transformer of each Unit. The second independent circuit for A. C. power for Units 2 and 3 is through a cross-tie with the opposite unit. For example, if Unit 2 loses its primary source of offsite A. C. power, the Unit 3 4kV cross-tie breakers would close and Unit 2 would receive offsite power through this cross-tie. The single line diagram of the cross-tie is shown in Figure 1. Surveillance Requirement (SR) 4.8.1.1.1.a requires that the appropriate opposite unit buses be OPERABLE for this cross-tie to be OPERABLE.

The cross-ties between the Units are at the 4kV level only. Transformers BO4X and BO6X are 4kV/480V and allow 480V loads to be connected to their own Unit's respective 4kV buses (2B04 to 2A04, 2B06 to 2A06, etc.).

During the upcoming Units 2 and 3 Cycle 7 refueling outages, SCE intends to replace the 480V load center transformers B04X and B06X. In accordance with SR 4.8.1.1.1.a, the Unit 2 load centers, including these transformers, are required to be OPERABLE for the Unit 3 cross-tie and vice versa. Therefore, during the Unit 2 Cycle 7 refueling outage, the replacement of load center transformers 2B04X and 2B06X will cause the cross-tie to Unit 3 to become INOPERABLE. The replacement work is expected to require approximately 120 hours per train to complete. TS 3.8.1.1 ACTION a.1 allows only 72 hours with one of the two A. C. sources unavailable before the unit must be shut down. Therefore, Unit 3 would also need to be shut down. This situation will be reversed during the Unit 3 Cycle 7 refueling outage.

This proposed change will add a footnote to SR 4.8.1.1.1.a for Units 2 and 3 to allow the tie breakers to remain OPERABLE with load centers BO4 and BU6 INOPERABLE because of the 480V transformer replacement during the opposite unit



Cycle 7 refueling outage. Although the Unit 3 SR currently is for tie breakers 2A0416 and 2A0603, the proposed footnote for Unit 3 lists tie breakers 2A0417 and 2A0619. This is because the SR currently lists the incorrect breakers. This will be corrected by PCN 363, which was submitted on November 25, 1991 (see Enclosure 2).

# Discussion

During Modes 1 through 4 it is necessary for the 480V load centers to be OPERABLE to support normal operating loads on their own unit as well as being capable of supporting the cross-tie function for the companion Unit. However, in Modes 5 and 6 only one electrical train is required; the only function the load centers on the second train perform is providing power to the respective battery chargers, which in turn charge the 125V Battery Banks (A, B, C, and D). Battery Banks A and B must remain OPERABLE to power the cross-tie breakers.

In Modes 5 and 6 only two of these four battery banks are required to be OPERABLE. The battery chargers are covered by TS 3/4.8.2.2 ACTION b, which states that when a required charger is INOPERABLE, demonstrate the OPERABILITY of the battery bank by performing SR 4.8.2.1.a.1 within 1 hour and at least once per 8 hours thereafter to determine if the battery meets the Category A criteria of Table 4.8-2. If the battery charger is connected to a temporary power source to maintain sufficient voltage, the battery bank is capable of performing its function and the cross-tie can be considered OPERABLE. Performing the SR assures that operability of the battery bank, and therefore the cross-tie, is maintained.

The replacement of the 480V transformers can therefore be accomplished without physically causing the unit cross-ties to be INOPERABLE. The one-time exception is necessary because SR 4.8.1.1.1.a specifically calls for the load centers to be OPERABLE to support the cross-tie. During the replacement of the transformers, a charger being fed from non-Class 1E power will be attached to the associated battery bank, and SR 4.8.2.1.a.1 will be performed according to TS 3/4.8.2.2, ACTION b. Because the associated battery bank remains OPERABLE by performance of TS 3/4.8.2.2 ACTION b, there is no degradation of the offsite source by using a non-class 1E powered charger for this application.

#### Safety Analysis

The proposed change described 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 facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response:

No

The purpose of maintaining redundant offsite power sources is to prevent a loss of offsite power. This proposed change allows a onetime exception to Technical Specification 4.8.1.1.1.a to allow the tie-breakers to the opposite unit cross-tie to be OPERABLE while the associated load centers B04 and B06 are INOPERABLE. This will allow replacement of the 480V transformers. While the replacement is performed, a charger will be attached to the associated battery bank and will be connected to the temporary non-class 1E power sources. The associated battery bank will be maintained OPERABLE by performance of TS 3/4.8.2.2 ACTION b. The cross-tie will remain OPERABLE and able to perform its function of providing a second source of A. C. power to the companion Unit. Therefore, there is no increase in probability or consequences of a loss of offsite power or any other accident previously evaluated.

2:

Will operation of the facility in accordance with this proposed change create the possibility of a new or different type of accident from any previously evaluated?

#### Response:

#### No

This proposed change allows a one-time exception to Technical Specification 4.8.1.1.1.a to allow the tie breakers to the opposite unit cross-tie to be OPERABLE while the associated load centers B04 and B06 are INOPERABLE. This will allow replacement of the 480V transformers. While the replacement is performed, a charger will be attached to the associated battery bank and will be connected to the temporary non-class 1E power sources. The associated battery bank will be maintained OPERABLE by performance of TS 3/4.8.2.2 ACTION b. The cross-tie will remain OPERABLE and able to perform its function of providing a second source of A. C. power to the companion unit. Therefore, there is no possibility of a new or different type of accident than any previously evaluated.

3: Will operation of the facility according to this proposed change involve a significant reduction in a margin of safety?

#### Response:

No

This proposed change allows a one-time exception to Technical Specification 4.8.1.1.1.a to allow the tie breakers to the opposite unit cross-tie to be OPERABLE while the associated load centers B04 and B06 are INOPERABLE. This will allow replacement of the 480V transformers. While the replacement is performed, a charger will be attached to the associated battery bank and will be connected to the temporary non-class 1E power sources. The associated battery bank will be maintained OPERABLE by performance of TS 3/4.8.2.2 ACTION b. The cross-tie will remain OPERABLE and able to perform its function of providing a second source of A. C. power to the companion Unit. Therefore, there is no significant reduction in a margin of safety.

## Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: 1) the proposed change does not constitute a significant hazards consideration as defined by 10CFR50.92; 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 Final Environmental Statement.