

ENCLOSURE 1

PCN-428

PROPOSED CHANGES TO UNIT 2 LICENSE CONDITION 2.C.(19)b  
AND UNITS 2 AND 3 TECHNICAL SPECIFICATIONS 6.2.2.f

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA	)	Docket No. 50-361
EDISON COMPANY, <u>ET AL.</u> for a Class 103	)	
License to Acquire, Possess, and Use	)	
a Utilization Facility as Part of	)	Amendment Application
Unit No. 2 of the San Onofre Nuclear	)	No. 133
Generating Station	)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 133.

This amendment application consists of Proposed Change Number (PCN)-428 to Facility Operating License No. NPF-10. PCN-428 is a request to delete Unit 2 License Condition 2.C.(19)b, "Shift Manning (I.A.1.3, SSER #1, SSER #5)," and replace this License Condition with a new shift manning Technical Specification (TS) 6.2.2.f. The proposed TS 6.2.2.f is based on NUREG-1432 (Combustion Engineering Owners Group Standard Technical Specifications), dated September 28, 1992, and the model TS provided in Enclosure 2 of Generic Letter (GL) 82-16, "NUREG-0737 Technical Specifications."

Subscribed on this 15<sup>th</sup> day of JULY, 1993.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

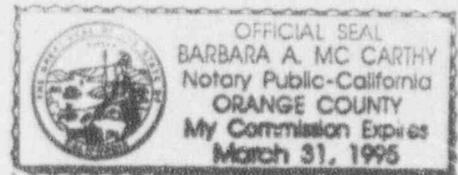
By: R M Rosenblum  
R. M. Rosenblum  
Vice President

State of California  
County of Orange

On 7/15/93 before me, BARBARA A. MCCARTHY/NOTARY PUBLIC,  
personally appeared RICHARD M. ROSENBLUM, 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 Barbara A. McCarthy



James P. Scott Shotwell  
Attorney for Southern  
California Edison Company

By: James P. Scott Shotwell  
James P. Scott Shotwell

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA	)	Docket No. 50-362
EDISON COMPANY, <u>ET AL.</u> for a Class 103	)	
License to Acquire, Possess, and Use	)	
a Utilization Facility as Part of	)	Amendment Application
Unit No. 3 of the San Onofre Nuclear	)	No. 117
Generating Station	)	

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 117.

This amendment application consists of Proposed Change Number (PCN)-428 to Facility Operating License No. NPF-15. PCN-428 is a request to revise Unit 3 Technical Specification 6.2.2.f based on NUREG-1432 (Combustion Engineering Owners Group Standard Technical Specifications), dated September 28, 1992, and the model TS provided in Enclosure 2 of Generic Letter (GL) 82-16, "NUREG-0737 Technical Specifications."

Subscribed on this 15<sup>th</sup> day of July, 1993.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

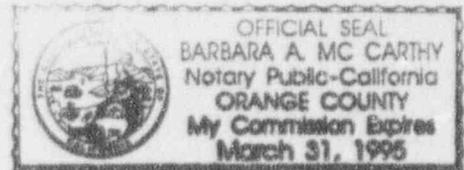
By: *R. M. Rosenblum*  
R. M. Rosenblum  
Vice President

State of California  
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On 7/15/93 before me, BARBARA A. MCCARTHY/NOTARY PUBLIC,  
personally appeared RICHARD M. ROSENBLUM, 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 *Barbara A. McCarthy*



James P. Scott Shotwell  
Attorney for Southern  
California Edison Company

By: *James P. Scott Shotwell*  
James P. Scott Shotwell

**DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NPF-10/15-428**

PCN-428 is a request to 1) delete Unit 2 License Condition 2.C.(19)b, "Shift Manning (I.A.1.3, SSER #1, SSER #5)," 2) replace this Unit 2 License Condition with a new Unit 2 shift manning Technical Specification (TS) 6.2.2.f, and 3) revise Unit 3 TS 6.2.2.f.

Existing License Condition

Attachment A - Existing License Condition, Unit 2

Existing Specifications

Attachment B - Existing Specifications, Unit 2

Attachment C - Existing Specifications, Unit 3

Proposed License Condition

Attachment D - Proposed License Condition, Unit 2

Proposed Specifications

Attachment E - Proposed Specifications, Unit 2

Attachment F - Proposed Specifications, Unit 3

DESCRIPTION

**CHANGES TO LICENSE CONDITION 2.C.(19)b FOR UNIT 2**

Unit 2 Facility Operating License Condition 2.C.(19)b, "Shift Manning (I.A.1.3, SSER #1, SSER #5)," is deleted. The shift manning requirement for Unit 2 is proposed as a new TS 6.2.2.f.

**CHANGES TO TS SECTION 6.2.2.f**

A new TS 6.2.2.f is proposed for Unit 2 and TS 6.2.2.f is revised for Unit 3. TS 6.2.2.f is proposed for Unit 2 to make the location of the shift manning requirement consistent with Unit 3. The proposed TS 6.2.2.f for both Units 2 and 3 is based on NUREG-1432 (Combustion Engineering Owners Group Standard Technical Specifications) dated September 28, 1992, and the model TS provided in Enclosure 2 of Generic Letter (GL) 82-16, "NUREG-0737 Technical Specifications."

DISCUSSION

**CHANGES TO LICENSE CONDITION 2.C.(19)b FOR UNIT 2**

Unit 2 Facility Operating License Condition 2.C.(19)b, "Shift Manning (I.A.1.3, SSER #1, SSER #5)," is deleted because the shift manning requirement is proposed to be in the administrative controls section of the Unit 2 TSs as

TS 6.2.2.f. This change also makes the Unit 2 TSs consistent with the Unit 3 TSs.

#### CHANGES TO TS SECTION 6.2.2.f

Unlike the Unit 3 TSs where the shift manning requirement is in the administrative controls section of the TSs (TS 6.2.2.f), the Unit 2 shift manning requirement is in the Low Power Operating License as License Condition 2.C.(19)b. To make the location of the Unit 2 shift manning requirements consistent with the Unit 3 TSs, this proposed change deletes the Unit 2 License Condition 2.C.(19)b and adds TS 6.2.2.f to the Unit 2 TSs. This change also revises the existing Unit 3 TS 6.2.2.f to be consistent with the proposed Unit 2 TS 6.2.2.f.

The proposed TS 6.2.2.f for both Units 2 and 3 is based on NUREG-1432 (Combustion Engineering Owners Group Standard Technical Specifications) dated September 28, 1992, and the model TS provided in Enclosure 2 of Generic Letter (GL) 82-16, "NUREG-0737 Technical Specifications." Further, this proposed change 1) allows the Cognizant Functional Division Managers to approve overtime deviations for the Station Manager in accordance with administrative procedures and 2) provides a 2 hour margin within a 48-hour period in TS 6.2.2.f.2) such that personnel on the 12-hour shift schedule will be able to perform administrative duties such as Fitness for Duty testing without affecting their shift rotation and requiring deviations from the overtime specifications. The guidelines for overtime are the maximum limits, and margins are normally provided between the established limits and the normal work shift. Therefore, the proposed 2 hour margin within a 48-hour period is considered appropriate.

Since Units 2 and 3 implemented the 12-hour shift schedule, approximately 150 overtime deviations due to Fitness for Duty testing and routine switches from daylight savings to standard time were approved. The proposed change will eliminate the unnecessary task of initiating overtime deviations and requiring management approval for these types of overtime.

For Unit 2 TS 6.2.2.f, replace "Reserved" with the following:

Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed SROs, licensed ROs, health physicists, nuclear plant equipment operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work an 8 or 12-hour day, nominal 40-hour week, while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis, the following guidelines shall be followed:

- 1) An individual should not be permitted to work more than 16 continuous hours, excluding shift turnover time.

- 2) An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
- 3) A break of at least 8 hours should be allowed between work periods, including shift turnover time.
- 4) Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Station Manager or designee, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Station Manager or designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

\* Personnel regularly assigned to 12-hour shifts may work up to 26 hours in a 48-hour period.

For Unit 3 TS 6.2.2.f, the changes are:

1. In the first paragraph after "functions," replace "; e.g., senior reactor operators, reactor operators" with "(e.g., licensed SROs, licensed ROs." Next, replace "auxiliary operators" with "nuclear plant equipment operators," and add ")" after maintenance personnel." The "nuclear plant equipment operators" designation instead of "auxiliary operators" is specifically used at San Onofre. Except for this change, the remaining changes in this paragraph are consistent with NUREG-1432.
2. In the second sentence of the second paragraph, change "a normal 8-hour day" to "an 8 or 12-hour day," add "nominal" before "40-hour week," and change "plant" to "unit." These changes are consistent with NUREG-1432.

The change from "a normal 8-hour day" to "an 8 or 12-hour day" allows members of the unit staff to work either 8-hour shifts or 12-hour shifts. The reference to an 8 or 12-hour day is made because different site organizations utilize different shift schedules.

In the third sentence of the second paragraph, add "," after "major maintenance" and replace "modifications" with "modification." These changes are editorial.

3. Under Item 1), revise "16 hours straight" to "16 continuous hours." This change is editorial.
  4. Under Item 2) add "\*" after "24" to indicate a change that provides a 2 hour margin within a 48-hour period for personnel on the 12-hour shift schedule. This change will allow personnel to perform administrative duties such as random Fitness For Duty testing without affecting their shift rotation or requiring management approval for a deviation from the overtime specifications.
- Add a Footnote which reads "\*" Personnel regularly assigned to 12-hour shifts may work up to 26 hours in a 48-hour period." This change makes both the Units 2 and 3 TSs consistent.
5. Under Item 3) between "least" and "hours" change "eight" to "8." This change is editorial.
  6. In the first sentence of the seventh paragraph, which starts with "Any deviation," after "Station Manager" replace ", his deputy, the Manager, Operations" with "or designee, in accordance with approved administrative procedures," and insert "by" between "or" and "higher levels." These changes are consistent with NUREG-1432.

Make the second sentence of the existing paragraph which starts with "Controls shall be" and the third sentence which starts with "Routine" into a separate paragraph. This change is consistent with NUREG-1432.

Then delete "his" after "or." This change is editorial. Replace "assure" with "ensure." This change is consistent with NUREG-1432.

#### 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

#### **Change to Unit 2 License Condition 2.C.(19)b**

The proposed deletion of Unit 2 License Condition 2.C.(19)b, "Shift Manning (I.A.1.3, SSER #1, SSER #5,)" is administrative in nature and will not impact the probability or consequences of an accident previously evaluated. This proposed change merely transfers the shift manning requirement, with proposed revisions, from a license condition to the administrative controls section of the Technical Specifications (TSs) to make the format of the Unit 2 TSs consistent with the format of

the Unit 3 TSs. Therefore, 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.

#### **Change to Units 2 and 3 Technical Specification 6.2.2.f**

The proposed TS 6.2.2.f revises the shift manning requirements based on NUREG-1432 (Combustion Engineering Owners Group Standard Technical Specifications) dated September 28, 1992, and the model technical specification provided in Generic Letter 82-16, "NUREG-0737 Technical Specifications."

The proposed TS 6.2.2.f.2) change from "...no more than 24 hours in any 48-hour" to "...no more than 26 hours in any 48-hour period" merely adds 2 hours to the normal work shifts to eliminate the onerous task of initiating overtime deviations and obtaining management approval for the minor overtime deviations due to random Fitness for Duty testing and the routine switches from daylight savings to standard time. The overtime guidelines are the maximum limits, and margins are normally provided between the established limits and the normal work shift. Therefore, the proposed change to TS 6.2.2.f.2) is consistent with the overtime guidelines.

The proposed changes to TS 6.2.2.f, including the change to TS 6.2.2.f.2), are administrative in nature and will not impact the probability or consequences of an accident previously evaluated. Therefore, operation of the facility in accordance with these proposed changes 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

#### **Change to Unit 2 License Condition 2.C.(19)b**

The proposed deletion of Unit 2 License Condition 2.C.(19)b and transfer of the shift manning requirement, with proposed revisions, from a license condition to the administrative controls section of the TSs is administrative in nature and will not impact the configuration of any equipment, system, or the plant. Therefore, 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.

#### **Change to Units 2 and 3 Technical Specification 6.2.2.f**

The proposed changes to TS 6.2.2.f, including the change to TS 6.2.2.f.2), are administrative in nature and will not impact the configuration of any equipment, system, or the plant. Therefore, 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

#### **Change to Unit 2 License Condition 2.C.(19)b**

The proposed deletion of Unit 2 License Condition 2.C.(19)b and transfer of the shift manning requirement, with proposed revisions, from a license condition to the administrative controls section of the TSs is administrative in nature and will not impact any design basis events or margin of safety associated with these events. Therefore, operation of the facility in accordance with this proposed change will not involve a significant reduction in a margin of safety.

#### **Change to Units 2 and 3 Technical Specification 6.2.2.f**

The proposed changes to TS 6.2.2.f, including the change to TS 6.2.2.f.2), are administrative in nature and will not impact any design basis events or margin of safety associated with these events. Therefore, operation of the facility in accordance with this proposed change will not involve a 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 10 CFR 50.92; 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.

ATTACHMENT A

EXISTING LICENSE CONDITION  
UNIT 2

(18) Initial Test Program (Section 14, SER)

SCE shall conduct the post-fuel loading initial test program (set forth in Section 14 of the San Onofre Units 2 and 3 Final Safety Analysis Report, as amended) without making any major modifications to this program unless such modifications have been identified and have received prior NRC approval. Major modifications are defined as:

- a. Elimination of any test identified in Section 14 of the Final Safety Analysis Report, as amended, as being essential.
- b. Modification of test objectives, methods, or acceptance criteria for any test identified in Section 14 of the Final Safety Analysis Report, as amended, as being essential.
- c. Performance of any test at a power level different than that described in the test procedure.
- d. Failure to complete any tests included in the described program (planned or scheduled for power levels up to the authorized power level).

(19) WUREG-0737 Conditions (Section 22)

Each of the following conditions shall be completed to the satisfaction of the NRC. Each item references the related subpart of Section 22 of the SER and/or its supplements.

a. Shift Technical Advisor (1.A.1.1, SSEK #1)

SCE shall provide a fully trained on-shift technical advisor to the shift supervisor (watch engineer).

b. Shift Manning (1.A.1.3, SSEK #1, SSER #5)

SCE shall develop and implement administrative procedures to limit the working hours of individuals of the nuclear power plant operating staff who are responsible for manipulating plant controls or for adjusting on-line systems and equipment affecting plant safety which would have an immediate impact on public health and safety.

Adequate shift coverage shall be maintained without routine heavy use of overtime. However, in the event that unforeseen problems require substantial amounts of overtime to be used, the following guidelines shall be followed:

1. An individual shall not be permitted to work more than 16 hours straight (excluding shift turnover time).
2. An individual shall not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven day period (all excluding shift turnover time).
3. A break of at least eight hours shall be allowed between work periods (including shift turnover time).
4. The use of overtime shall be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the station manager, his deputy, the operations manager, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime will be reviewed monthly by the station manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

c. Independent Safety Engineering Group (I.B.1.2, SSER #1)

SCE shall have an on-site independent safety engineering group.

d. Procedures for Transients and Accidents (I.C.1, SSER #1, SSER #2, SSER #3)

By May 1, 1982, SCE shall provide emergency procedure guidelines. Emergency procedures based on guidelines approved by the NRC shall be implemented prior to startup following the first refueling outage.

e. Procedures for Verifying Correct Performance of Operating Activities (I.C.6, SSER #1)

Prior to fuel loading, SCE shall implement a system for verifying the correct performance of operating activities, and shall keep the system in effect thereafter.

f. Control Room Design Review (I.D.1, SSER #1)

Prior to exceeding five (5) percent power, SCE shall:

1. Prioritize the control room annunciator windows.