

# UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

RELATED TO AMENDMENT NO. 110TO FACILITY OPERATING LICENSE NO. NPF-10

AND AMENDMENT NO. 99 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, UNITS 2 AND 3

DOCKET NOS. 50-361 AND 50-362

#### 1.0 INTRODUCTION

By letter dated April 7, 1992, Southern California Edison Company, et al. (SCE or the licensee) submitted a request for changes to the Technical Specifications (TS) for San Onofre Nuclear Cenerating Station, Unit Nos. 2 and 3. The proposed changes would revise Technical Specifications Tables 3.3-3, 3.3-4, 3.3-5, and 4.3-2, which provide the requirements for the Engineered Safety Features Actuation System (ESFAS) instrumentation. This Technical Specification change will clarify that a manual Safety Injection Actuation Signal (SIAS) does not actuate a Containment Cooling Actuation Signal (CCAS). This is an editorial change to make the Technical Specifications consistent with plant design.

#### 2.0 EVALUATION

TS 3.3.2 requires ESFAS instrumentation channels in Table 3.3-3 to be OPERABLE with their trip setpoints consistent with the values in Table 3.3-4 and response times shown in Table 3.3-5. TS 4.3.2.1 requires ESFAS instrumentation to be demonstrated OPERABLE at the frequencies listed in Table 4.3-2.

As written, the TS require surveillance and operability of a nonexistent channel for manual SIAS initiation of CCAS. Plant design, as shown in Figure 7.3-9 in the Updated Final Safety Analysis Report for San Onofre Units 2 and 3, does not include initiation of CCAS by a manual SIAS. The automatic actuation logic resulting from low pressurizer pressure or high containment pressure initiates both an SIAS and a CCAS. However, SIAS remote manual logic initiates an SIAS only. Standard Technical Specification 3/4.3.2 (NUREG-0212, Rev 2) also does not include manual SIAS initiation of CCAS.

The Containment Cooling System has normal operating functions as well as emergency operating functions. Therefore, CCAS has its own manual initiating logic so it can be operated independently of the Safety Injection System, which is only operated under accident conditions.

The correct actuation logic is also reflected in the normal operating procedures, the abnormal and emergency operating instructions, and the maintenance procedures for Units 2 and 3.

The error listing manual SIAS as initiating a CCAS was in the original application for Facility Operating Licenses NPF-10 and NPF-15. This was not discovered by the licensee until recently because the correct logic is shown consistently in the surveillance and operability procedures and training manuals. The error was discovered during research for the Technical Specification Improvement Project.

The staff agrees with the licensee that manual SIAS was never intended to initiate CCAS, and that deleting the requirements related to manual SIAS actuation of CCAS makes the San Onofre, Units 2 and 3, TS consistent with plant design and procedures, and the Standard Technical Specifications. Therefore, the proposed changes to TS Tables 3.3-3, 3.3-4, 3.3-5, and 4.3-2, are acceptable.

## 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the California State official was notified of the proposed issuance of the amendment. The State official had no comments.

## 4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20, and change surveillance requirements. The NRC 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 (57 FR 24679). 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 the amendments.

### 5.0 CONCLUSION

The Commission has 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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: February 4, 1994