

March 21, 1994

Mr. Brian Woods  
Southern California Edison Company  
23 Parker Street  
Irvine, CA 92718

Dear Mr. Woods:

Enclosed are NRC staff comments to Sections 3.1 and 3.2 of the San Onofre technical specifications (TS) (TAC #'s 86191 & 86192, and Dockets 50-361 & 50-362). If necessary, after you review these comments we can arrange to meet to discuss them.

The generic changes to Standard TS NUREG-1432 need to be reviewed by SCE for applicability to the San Onofre 2 and 3 TS, and those changes found applicable need to be incorporated. This review can be done at any time prior to the final resolution of TS issues in June.

Sincerely,

Original signed by:

T. R. Tjader, Reactor Engineer  
Technical Specifications Branch  
Division of Operating Reactor Support  
Office Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission

Enclosure: As stated

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Mr. Brian Woods  
Southern California Edison Company  
23 Parker Street  
Irvine, CA 92718

Dear Brian:

Enclosed are NRC staff comments to Sections 3.1 and 3.2 of the San Onofre Lead plant Standard Technical Specification (STS) (TAC #'s 86191 & 86192, and Dockets 50-361 & 50-362). If necessary, after you review these comments we can arrange to meet to discuss them.

The generic changes to STS NUREG-1432 need to be reviewed by SCE for applicability to the San Onofre 2 and 3 STS, and those changes found applicable need to be incorporated. This review can be done at any time prior to the final resolution of STS issues in June.

Sincerely,

T. R. Tjader, Reactor Engineer  
Technical Specifications Branch  
Division of Operating Reactor Support  
Office Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 21, 1994

Mr. Brian Woods  
Southern California Edison Company  
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Dear Mr. Woods:

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The generic changes to Standard TS NUREG-1432 need to be reviewed by SCE for applicability to the San Onofre 2 and 3 TS, and those changes found applicable need to be incorporated. This review can be done at any time prior to the final resolution of TS issues in June.

Sincerely,

A handwritten signature in cursive script, appearing to read "T. R. Tjader".

T. R. Tjader, Reactor Engineer  
Technical Specifications Branch  
Division of Operating Reactor Support  
Office Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission

Enclosure: As stated

COMMENTS ON SCE STS SUBMITTAL  
FOR SAN ONOFRE 2 & 3

SPECIFICATION 3.1.1, SDM- $T_{avg} > 200^{\circ}$ :

1) It should be emphasized that the Bases change related to allowing the SDM calculation not to account for a stuck out rod, is only allowed when there are two independent means for verifying all rods are on the bottom, and when there is sufficient shutdown margin to keep the reactor shutdown with the highest worth rod ejected.

2) Do not delete the boration example in the Action A.1 Bases. Make it applicable if necessary.

SPECIFICATION 3.1.2, SDM- $T_{avg} < 200^{\circ}$ :

1) The new Surveillance Requirement is not addressed in the Bases, and it is not supported in the justifications pages.

SPECIFICATION 3.1.3, Reactivity Balance:

1) The frequency and note to the Surveillance Requirement have been changed without adequate justification (actually, my copy of SONGS STS did not include any justifications for this section). This SR should remain applicable prior to entry into MODE 1.

2) The word "prediction" was substituted for "indication" in the BASES Background section. Why? "Prediction" seems too definite.

3) The reference to the LCS in the BASES Applicability section should be more specific.

SPECIFICATION 3.1.4, MTC:

1) The revisions to SR 3.1.4.2 should not be incorporated without the plant specific analysis and justification called for in NUREG 1366.

2) The last two sentences of the Background section of the BASES should not be changed as indicated (regarding Temperature-Reactivity changes). The STS NUREG is correct.

3) Numerous changes to the BASES require justification/discussion (changes 8, 10, 11, 12, 13).

SPECIFICATION 3.1.5, CEA Alignment:

1) Delete the parenthetical phrase in the LCO on 2 of 3 indications. It is not justified, and it is information that can be addressed in the BASES.

2) Required Action refers to power requirements in the Licensee Controlled Specifications (LCS). This should be more specific, and at a minimum discussed in the BASES.

3) Condition D is not required. The CEA Position indication LCO was deleted by the Split Report. There is no apparent benefit to retaining this Condition.

4) NUREG-1432 change justification comments 12 to 16 are missing.

#### SPECIFICATION 3.1.8, CEA Insertion Limits:

1) The change to Required Action A.2 is not justified nor is it addressed in the BASES.

#### SPECIFICATION 3.1.9, BORATION SYSTEMS-OPERATING:

1) The BASES are inadequate and need to be rewritten, meeting the STS format and content requirements.

2) The Required Action(s) to Condition C should be in a standard shutdown progression.

#### SPECIFICATIONS 3.1.10 AND 3.1.11, BORATION SOURCES AND SYSTEMS, SHUTDOWN:

1) Combine these two specifications. The redundancy is not necessary.

2) It is not necessary to define system OPERABILITY in the LCO. This can be accomplished in the BASES.

3) The BASES are inadequate and need to be rewritten, meeting the STS format and content requirements.

#### SPECIFICATIONS 3.1.12 STE MODES 2 & 3, AND 3.1.13 STE MODE 1:

1) In general, the changes, and in particular the differences with NUREG-1432 are not justified.

2) In 3.1.12 suspension of LCO 3.3.1 is not adequately justified nor discussed in the BASES (i.e., in the APPLICABLE SAFETY ANALYSIS).

3) In 3.1.13, why isn't Required Action B.1 worded similar to A.1.1 in 3.1.14 (where it appears correctly stated). Why is B.2, "Suspend PHYSICS TESTS," deleted?

4) In 3.1.13 APPLICABLE SAFETY ANALYSIS in the BASES, discuss why a "power plateau  $\leq$  85% RTP ensures that LHR is maintained within acceptable limits."

5) In 3.1.14 Required Actions A, shouldn't PHYSICS TESTS be suspended? Also the numbering is wrong (should be A.1 vs A.1.1). The BASES only address Required Action A.1.1.

#### SPECIFICATION 3.2.1, LHR:

1) In Surveillance requirement 3.2.1.1, the word "each" was replaced with "all" ... channels. Why? "Each" seems to be more explicit.

#### SPECIFICATION 3.2.2, $F_{xy}$ :

1) "Equal to or less than" versus "less than or equal to," isn't this a generic C.1 change and not a D.1 change. Is it significant enough that you want to deviate from the agreed standard? [Recurrs throughout]

2) The location of the logical connectors or numbering of the Required Actions should be changed to avoid confusion. A.3 can be done alone, and not necessarily in conjunction with A.1.

3) The frequency of SR 3.2.2.1 has been changed from "> 70% RTP" to "> 85% RTP." This needs to be justified. Both the CE STS and your previous TS have "> 70% RTP."

#### SPECIFICATION 3.2.3, $T_q$ :

1) The deleted NOTE, previously associated with the B.3 Frequency, should be reconsidered. Perhaps it should be retained with C.2.

2) The BASES for SR 3.2.3.2 has been changed from alerting the operator if " $T_q$  approaches" to " $T_q$  exceeds" its limit. "Approaches" seems more appropriate.

3) In the third paragraph of 10, justifying the new C.1 ....., the third sentence states " $T_q > 0.10$ " and it should be " $T_q < 0.10$ ."

#### SPECIFICATION 3.2.4, DNBR:

1) The LCO deletes reference to specific figures in the COLR, why?