

May 18, 1994

50-361

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

Dear Mr. Woods:

Enclosed are NRC staff comments to Section 3.7 of the San Onofre technical specifications (TS) (TAC #'s 86191 & 86192, and Dockets 50-361 & 50-362). After you review these comments, I suggest we arrange a meeting to discuss them. In particular, a meeting with the NRC staff is necessary to discuss the methodology and use of a Safety Valve Operating Report (SAVOR) for the Main Steam Safety Valve (MSSV) Specification.

In general, references in the Bases need to be checked and consolidated.

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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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Enclosed are NRC staff comments to Section 3.7 of the San Onofre technical specifications (TS) (TAC #'s 86191 & 86192, and Dockets 50-361 & 50-362). After you review these comments, I suggest we arrange a meeting to discuss them. In particular, a meeting with the NRC staff is necessary to discuss the methodology and use of a Safety Valve Operating Report (SAVOR) for the Main Steam Safety Valve (MSSV) Specification.

In general, references in the Bases need to be checked and consolidated.

Sincerely,

A handwritten signature in black ink, appearing to read "T. R. Jader".

T. R. Jader, 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 3.7.1, MSSVs:

1) The use of a Safety Valve Operating Report (SAVOR) has not been approved. To be approved the methodology for determining the safety valve setpoints (lift and trip) and the number of safety valves required per operating power level needs to be submitted for review. Return tables 3.7.1-1 and 3.7.1-2 to LCO 3.7.1 and all associated changes to the STS (NUREG-1432) format. Even with an approved methodology it is not clear that the related information is appropriate for relocation to a report outside of Technical Specifications.

2) Required action A.2, reducing overpower trip setpoints, should not be deleted.

3) The change in Conditions A and B wording, from the STS wording, to "per SG" is not consistent with the existing San Onofre TS. The change in wording is not necessary; table 3.7.1-1 will stipulate the appropriate power level for the number of inoperable MSSVs.

4) PCN 329, on changing the MSSV set point tolerances is still under review.

5) In the Bases, Applicable Safety Analysis section, the change in the third from last paragraph was not incorporated correctly. It should be "... which is less than the rated capacity of four of the MSSVs" and not "... equal to the rated capacity...".

6) Changes to the Bases should be made consistent with the above comments.

SPECIFICATION 3.7.2, MSIVs:

1) The sixth paragraph of the proposed Bases Background is not included in the STS mark-up (Attachment C). Why is this paragraph included?

2) In the proposed Bases Action section, the number A.1, and the first two lines of the first paragraph were left off the first paragraph and were included at the beginning of the second paragraph. This is an editorial error.

SPECIFICATION 3.7.3, MFIVs:

1) The completion time (CT) for Required Action A.1 has been changed from 72 hours (in the STS) to 7 days (in the proposed TS) based upon PRA data. While the PRA data quoted indicated a quite low CDF, in general changes to the TS are not incorporated based upon PRA data alone. In addition, the San Onofre design has only one MFIV per SG, while the STS was based upon 2 MFIVs per SG (which would lead to a conclusion for a shorter CT). Prior to

accepting this change the NRC staff needs to evaluate the PRA data. Do not change the A.1 CT to 7 days.

2) In the LCO Bases section, the last sentence of the second paragraph of this subsection in the STS was not included in the proposed TS for Units 2 and 3. There is no justification for its deletion (its deletion may be inadvertent).

SPECIFICATION 3.7.4, ADVs:

1) The last two sentences in SR 3.7.4.2 Bases, as provided by the STS, were deleted in the Proposed TS for Units 2 and 3. The licensee should justify this deletion and include information on the appropriate frequency.

SPECIFICATION 3.7.5, AFW System:

1) Where did the version of the NUREG-1432 STS that was used in Attachment C come from? Conditions C through F are significantly different in my version and need to be discussed.

2) Do not delete "AND 10 days from discovery of failure to meet LCO," from the Completion Times. The justification for its removal did not make sense.

3) The last sentence of the second paragraph of the Bases for Action F.1, and the entire third paragraph of this subsection are a duplication of the Bases for Actions G.1 and G.2. Delete these in the Bases for Action F.1.

4) In SR 3.7.5.5, the units at the end of the second paragraph should be psig (as per the STS) rather than psia. The licensee should confirm this.

5) In the Note for SRs 3.7.5.2, 3.7.5.3, and 3.7.5.4 the frequency for performance of the identified surveillance requirements was changed from 24 hours to 72 hours. This frequency needs to be justified and addressed in the Bases.

SPECIFICATION 3.7.6, CST:

1) The Required Action B.2 completion time was increased from 18 to 36 hours without adequate justification.

2) CST tank level requirements in the LCO have been changed from gallons to percent (which is how the tank level is read). The actual capacity requirement is in terms of gallons, as it appears in the existing TS. Retain level requirements in gallons, and if desired San Onofre can stipulate level requirements in both gallons and percent.

3) Condition A should be "T-121 or T-120," not "and".

SPECIFICATION 3.7.10, ECW System:

1) In the Background section of the Bases, the first paragraph of insert A is confusing. The first sentence says that the ECWS remains operable if a supported system is inoperable or not required. Insert A needs to make clear that if the supported system inoperability is caused by the ECWS, then the ECWS is inoperable. Also, with insert A as written, it is not clear if the standby ECWS train would ever be considered inoperable (i.e., condition A would only be entered if the on-line ECW train became inoperable and then it is not certain that the standby ECW train would be available, let alone operable).

2) In the Background section of the Bases, only the first sentence of the 9th paragraph of the STS was included in the proposed TS. The remainder of the 9th paragraph was (inadvertently) deleted from the proposed TS.

SPECIFICATION 3.7.11, CREACUS:

1) In the Bases section for Actions E.1 and E.2, the word "CREACUS" in the second line, following the word "two", of the STS was mistakenly deleted from the proposed TS for Units 2 and 3. It should be returned.

2) In the Bases section for SR 3.7.11.1, in the second paragraph, third line, the word "frequency" and the phrase "on a STAGGERED TEST BASIS" were transposed in the proposed TS.

SPECIFICATION 3.7.14, FBACS:

1) The frequency for SR 3.7.14.1 has been changed from "31 days" (in the STS) to "31 days on a STAGGERED TEST BASIS" (in the proposed TS) because it is currently staggered. Since the meaning of "on a STAGGERED TEST BASIS" has changed from the current TS to the proposed TS, this change is not appropriate.

SPECIFICATION 3.7.17, Fuel Storage Pool Boron Concentration:

1) The frequency for SR 3.7.17.1 has been changed from "7 days" (in the STS) to "30 days" (in the proposed TS) because it is currently 30 days. This is acceptable only if the frequency is changed entirely to the way it is currently. That is, the frequency must state "30 days and within 72 hours prior to any fuel movement."

SPECIFICATION 3.7.19, Secondary Specific Activity:

1) In the third paragraph of the Proposed TS, the number .13 rem should be 0.13 rem.