UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. for a Class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 3 of the San Onofre Nuclear Generating Station	)))))	Docket No. 50-362 Amendment Application No. 102

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 102.

This amendment application consists of Proposed Change Number (PCN)-359 to Facility Operating License No. NPF-15. PCN-359 is a request to revise San Onofre Unit 3 Technical Specification (TS) 3/4.4.8.1, "Pressure-Temperature Limits," TS 3.4.8.3.1, "Overpressure Protection Systems-RCS Temperature ≤302°F," and TS 3.4.8.3.2, "Overpressure Protection Systems-RCS Temperature >302°F." The proposed change will revise the Reactor Coolant System (RCS) Pressure-Temperature (P-T) limit curves and the Low Temperature Overpressure Protection (LTOP) enable temperatures to be effective until 8 effective full power years (EFPY) of operation.

Subscribed on this 9th day of SEPTEMBER, 1992.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Harold B. Ray
Harold B. Ray
Senior Vice President

State of California
County of ORANGE
On 9/9/92 before me, BARBARA A. McCARTHY/NOTARY PUBLIC, personally appeared HAROLD B. RAY, 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

OFFICIAL SEAL
BARBARA A. MC CARTHY
Notary Public-California
ORANGE COUNTY
My Commission Expires
March 31, 1995

James A. Becletto
Attorney for Southern
California Edison Company

By: James A. Becletto

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-15-359

This is a request to revise Technical Specifications 3/4.4.8.1, "Pressure-Temperature Limits," 3.4.8.3.1, "Overpressure Protection Systems-RCS Temperature ≤302°F," and 3.4.8.3.2, "Overpressure Protection Systems-RCS Temperature >302°F," and associated Bases for San Onofre Unit 3.

Existing Specifications

Attachment A - Unit 3 Technical Specifications and Bases

Proposed Specifications

Attachment B - Unit 3 Technical Specifications and Bases

DESCRIPTION

Technical Specification (TS) 3/4.4.8.1, "Pressure-Temperature Limits," TS 3.4.8.3.1, "Overpressure Protection Systems-RCS Temperature ≤302°F," and 3.4.8.3.2, "Overpressure Protection Systems-RCS Temperature >302°F," provide the limiting conditions for operation, actions, and surveillance requirements for the Reactor Coolant System (RCS) overpressure protection systems.

The proposed change revises TSs 3/4.4.8.1 and associated Bases based on 1) the test results and analysis of the first irradiated surveillance capsule from San Onofre Unit 3, and 2) updated surveillance capsule material properties evaluated in response to Generic Letter (GL) 92-01, Revision 1, "Reactor Vessel Structural Integrity, 10 CFR 50.54(f)." The Unit 3 surveillance capsule was removed in May 1990 after 4.33 Effective Full Power Years (EFPY) of operation. The proposed change revises existing Figures 3.4-2, 3.4-3, 3.4-4, and 3.4-5 and adds new Figures 3.4-6 and 3.4-7 for Remote Shutdown cooldown operation. These two new figures account for the difference in Total Loop Uncertainties (TLUs) for pressure between shutdown instruments on the Remote Shutdown panels and shutdown instruments in the Control Room. The TLUs for temperature for both the Remote Shutdown instruments and the Control Room shutdown instruments are identical.

The proposed change also revises the Shutdown Cooling System (SDCS) OPERABILITY temperature in TSs 3.4.8.3.1 and 3.4.8.3.2 for RCS overpressure protection based on the Low Temperature Overpressure Protection (LTOP) range in TS Table 3.4-3. This SDCS Relief Valve (LTOP) OPERABILITY temperature is based on the methodology recommended by NUREG-0800, Branch Technical Position RSB 5-2, Revision 1, "Overpressurization Protection of Pressurized Water Reactors While Operating at Low Temperatures."

The proposed pressure-temperature (P-T) limit curves and LTOP OPERABILITY temperature shall be effective until 8 EFPY of plant operation. The specific changes to the above TSs are as follows:

TS INDEX

1. INDEX Page V, Section 3/4.4.8 - RCS temperatures changed from ≤302°F to ≤265°F, and from >302°F to >265°F.

2. INDEX Page XVII:

   a. Figure 3.4-2 - Add "SONGS 3" before "HEATUP," change "0-5 YEARS" to "8 EFPY," and add "NORMAL OPERATION" to the title of this Figure.

   b. Figure 3.4-3 - Replace "COOLDOWN" with "SONGS 3," change "LIMITATIONS" to "LIMITS, replace "0-5 YEARS" with "MAXIMUM ALLOWABLE HEATUP RATES (8 EFPY)," and add "NORMAL OPERATION" to the title of this Figure.

   c. Figure 3.4-4 - Add "SONGS 3 COOLDOWN" before "RCS," change "4-8 EFPY" is changed to "8 EFPY," and add "NORMAL OPERATION" to the title of this Figure.

   d. Figure 3.4-5 - Add "SONGS 3" before "RCS," change "(4-8 EFPY)" to "(8 EFPY)," and add "NORMAL OPERATION" to the title of this Figure.

   e. Add "Figure 3.4-6 SONGS 3 COOLDOWN RCS PRESSURE/TEMPERATURE LIMITATIONS FOR 8 EFPY -REMOTE SHUTDOWN OPERATION." This Figure is proposed to be located on Page 3/4 4-31b.

   f. Add "Figure 3.4-7 SONGS 3 RCS PRESSURE/TEMPERATURE LIMITS MAXIMUM ALLOWABLE COOLDOWN RATES (8 EFPY) -REMOTE SHUTDOWN OPERATION." This Figure is proposed to be located on Page 3/4 4-31c.

   g. Relocate Index Figures 5.6-1, "UNITS 2 AND 3 FUEL MINIMUM BURNUP VS. INITIAL ENRICHMENT FOR REGION II RACKS," 5.6-2, "UNIT 1 FUEL MINIMUM BURNUP VS. INITIAL ENRICHMENT FOR REGION II RACKS," and 5.6-3, "FUEL STORAGE PATTERNS FOR REGION II RACK" from XVII to Page XVIIa.

3. INDEX Page XVIIa - This page now includes Index Figures 5.6-1, 5.6-2, and 5.6-3 as discussed in Item 2.g above.

TS 3.4.8.1

The proposed change revises the existing P-T limits in Figures 3.4-2 and 3.4-4 based on the fluence at 8 EFPY. The proposed change also revises the LTOP enable temperatures in Table 3.4-3. The specific changes are as follows:

1. Add new Figures 3.4-6 and 3.4-7 to the LCO. These new Figures provide P-T limits for Remote Shutdown cooldown operation.

2. Increase the required RCS cold leg temperature from 153°F to 180°F to permit the maximum heatup rate of 60°F/hr in TS 3.4.8.1.a.

3. Increase the RCS cold leg temperature from 126°F to 175°F to permit the maximum cooldown rate of 100°F/hr in TS 3.4.8.1.b.

4. Delete the LIMITING CONDITION FOR OPERATION heading on page 3/4 4-28a. This existing heading is deleted because it is inappropriate for the Surveillance Requirements section of the TS. This change is editorial.

5. In Surveillance Requirement 4.4.8.1.2 the changes are:

   a. In the second sentence of the first paragraph, replace "and 3.4-3" after "Figures 3.4-2" with "through 3.4-7." This change makes the TS reflect the correct Figures.

   b. In the third sentence of the same paragraph, replace "based on the greater of the following:" after "Temperature" with "in accordance with Regulatory Guide 1.99, Revision 2, "Radiation Embrittlement of Reactor Vessel Materials," May 1988."

   c. Delete SR 4.4.8.1.2.a and 4.4.8.1.2.b.

   The existing SR 4.4.8.1.2 specifies that 1) surveillance data should be used to 1) recalculate the Adjusted Reference Temperature (ART) and update the RCS pressure-temperature limit curves, and 2) the ART should be recalculated based on the greater of the actual shift (ART) of the limiting plate determined from surveillance data or the predicted shift (ART) of the limiting weld determined from Regulatory Guide 1.99 Revision 2.

   The existing TS 4.4.8.1.2 does not accurately reflect the guidance of Regulatory Guide 1.99 Revision 2 on the use of surveillance data to determine the ART. Regulatory Guide 1.99, Revision 2 specifies that when two or more credible surveillance data sets become available, the ART should be calculated based on the surveillance data and the Regulatory Guide 1.99 methodology and the greater of the two ART values from this calculation should be used. The method of calculating ART applies to both vessel beltline plates and welds as long as the surveillance data are credible (as defined in Regulatory Guide 1.99, Revision 2). Hence, the revised TS 4.4.8.1.2 simply specifies that the surveillance capsule analysis results will be used to update the RCS pressure-temperature limits in accordance with Regulatory Guide 1.99, Revision 2. This change clarifies that no deviations from this guidance are intended.

6. Revise Figures 3.4-2 through 3.4-5 based on the test results and analysis of the Unit 3 surveillance capsule withdrawn in May 1990 and updated material properties evaluated in response to GL 92-01.

   a. Figure 3.4-2: SONGS 3 RCS PRESSURE/TEMPERATURE LIMITATIONS FOR 4-8 EFPY

      i. Add "HEATUP," change "4-8" to "8," and add "Normal Operation" in the title so that it reads "SONGS 3 HEATUP RCS

PRESSURE/TEMPERATURE LIMITATIONS FOR 8 EFPY Normal Operation."

ii. Inservice Test Curve - Change the Lowest Service Temperature (LST) from 202°F to 208°F. The allowable inservice test RCS pressure at the LST is decreased from 1650 psia at 202°F to 1054 psia at 208°F.

iii. Heatup Curve - Revise the 60°F/HR heatup curve based on the revised calculations. For the portion of the curve above the LTOP alignment temperature, all segments of the curve have shifted to the right, i.e., toward a lower allowed pressure at a given temperature.

iv. Core Critical Curve - Revise the curve corresponding to the change in the 60°F/HR heatup curve (i.e., 40°F above and parallel to the Heatup Curve). Change the minimum indicated RCS temperature from 256°F to 248°F, which is equal to the LST of 208°F + 40°F shift above the 60°F/HR heatup curve.

v. Change the "Indicated Pressurizer Pressure (Psia)" scale in Figure 3.4-2 to start at "15 psia" instead of "0" psia. The existing Figure 3.4-2 shows the 86°F Minimum Boltup Temperature (MBT) line intersecting the "0" psia line. This configuration also applies to Figure 3.4-4.

The proposed Figures 3.4-2 and 3.4-4 correct the existing TS which shows the 86°F MBT line intersecting the "0" psia line. The MBT should intersect the pressure which is equivalent to atmospheric pressure (15 psia) that exists in the RCS when the head is detensioned. Therefore, the "Indicated Pressurizer Pressure (Psia)" scale is changed to commence at "15 psia" instead of "0 psia."

b. Figure 3.4-3: SONGS 3 RCS PRESSURE/TEMPERATURE LIMITS MAXIMUM ALLOWABLE HEATUP RATES (4-8 EFPY)

i. Change "(4-8 EFPY)" to "(8 EFPY)," and add "Normal Operation" in the title to differentiate this curve from the remote shutdown allowable heatup rate curve.

ii. Decrease the maximum heat-up rate from 22°F/HR to 14°F/HR at the indicated RCS boltup temperature of 86°F.

iii. Increase the required RCS cold leg temperature from 153°F to 180°F to permit the maximum heatup rate of 60°F/hr.

c. Figure 3.4-4: SONGS 3 RCS PRESSURE/TEMPERATURE LIMITATIONS FOR 4-8 EFPY

i. Add "COOLDOWN," change "4-8 EFPY" to "8 EFPY," and add "Normal Operation" to the title so that it reads "SONGS 3

COOLDOWN RCS PRESSURE/TEMPERATURE LIMITATIONS FOR 8 EFPY, Normal Operation."

ii. Change the LST from 202°F to 208°F. The allowable inservice test RCS pressure at the LST is decreased from 1200 psia at 202°F to 680 psia at the new LST of 208°F.

iii. Change the pressure scale to start at 15 psia. The existing Figure 3.4-4 shows the pressure scale starting at 0 psia.

iv. Increase the required RCS cold leg temperature from 126°F to 175°F to permit the maximum cooldown rate of 100°F/HR.

d. Figure 3.4-5: SONGS 3 RCS PRESSURE/TEMPERATURE LIMITS MAXIMUM ALLOWABLE COOLDOWN RATES (4-8 EFPY)

i. Change "(4-8 EFPY)" to "(8 EFPY)," and add "Normal Operation" in the title to read "SONGS 3 RCS PRESSURE/TEMPERATURE LIMITS MAXIMUM ALLOWABLE COOLDOWN RATES (8 EFPY), Normal Operation.""

ii. Decrease the maximum allowable cooldown rate from 20°F/HR to 7.8°F/HR at the 86°F minimum boltup temperature with the head tensioned.

iii. Increase the required RCS cold leg temperature from 126°F to 175°F to permit the maximum cooldown rate of 100°F/HR.

7. Add Figure 3.4-6, "SONGS 3 COOLDOWN RCS PRESSURE/TEMPERATURE LIMITATIONS FOR 8 EFPY, Remote Shutdown Operation," and Figure 3.4-7, "SONGS 3 RCS PRESSURE/TEMPERATURE LIMITS MAXIMUM ALLOWABLE COOLDOWN RATES (8 EFPY), Remote Shutdown Operation."

These two new curves that are added to TS 3.4.8.1 are the result of an analysis which determined that the TLUs for pressure for the Remote Shutdown panel instruments are higher than the TLUs for pressure for the Control Room shutdown instruments. These new curves will account for the Remote Shutdown instrument TLUs. The TLUs for temperature for both the Remote Shutdown instruments and the Control Room shutdown instruments are identical.

8. ·ie 3.4-3: Low Temperature RCS Overpressure Protection Range

a. Decrease the Low Temperature Overpressure Protection (LTOP) OPERABILITY temperatures from 302°F to 265°F for heatup and from 267°F to 249°F for cooldown during normal operations.

b. Add LTOP OPERABILITY temperature of 249°F for remote shutdown cooldown operation. Indicate heatup operations are not performed from the Remote Shutdown panels.

TS 3.4.8.3.1

Revise the LTOP OPERABILITY temperature in the title from ≤302°F to ≤265°F.

TS 3.4.8.3.2

Revise the LTOP OPERABILITY temperature in the title from >302°F to >265°F.

BASES to TS 3/4.4.8

Revise the associated Bases to TS 3/4.4.8, "Pressure/Temperature Limits," to document the basis for these TS changes and update Table B 3/4.4-1, "Reactor Vessel Toughness" based on material properties evaluated in the July 6, 1992 SCE response to GL 92-01, Revision 1. The revisions to TS 3/4.4.8 Bases are as follows:

1. On Page B 3/4 4-7

   In the first sentence of the first paragraph, add "for normal operation" after "limit curves," change "Figures 3.4-2 and 3.4-3" in the parenthesis to "Figures 3.4-2 and 3.4-4," and add "and the cooldown limit curve for remote shutdown operation (Figure 3.4-6)" after the parenthetical "(Figures 3.4-2 and 3.4-4)." Add a new second sentence to the first paragraph to read "The limit curves for Remote Shutdown operation are determined using the Total Loop Uncertainties (TLUs) for temperature and pressure for the Remote Shutdown Panel instruments in which the pressure TLUs are higher than those for the Control Room shutdown instruments." In the last sentence of the first paragraph, change "3.4-3" to "3.4-4" and add "for normal operation and Figure 3.4-6 for Remote Shutdown operation" after "3.4-4."

   In the first sentence of the second paragraph, change "have been" to "were," and add "prior to reactor startup" after "tested." In the second sentence, add "and the updates in response to Generic Letter 92-01, "Reactor Vessel Structural Integrity, Revision 1" after "these tests." In the fourth sentence, change "Table 5.2-5" to Table "5.2-6." In the fifth sentence, add "limit curve (Figure 3.4-2)" after "heatup," "the" before "cooldown," and replace "Figures 3.4-2 and 3.4-3" with "Figures 3.4-4 and 3.4-6."

   In the first sentence of the third paragraph, add "50" after "10 CFR." This change makes the Unit 3 consistent with Unit 2.

   In the last paragraph, change "Figures" to "Figure," and delete 3.4-3. Neither the existing nor the proposed Figure 3.4-3 show the criticality or the inservice leak and hydrostatic testing pressure-temperature limit lines. This change is made to correct the description of the reference.

2. Add a new Page B 3/4 4-7a for the text overflow from Page B 3/4 4-7 which resulted from the above changes. The changes to the existing text in this page are:

1.. the second sentence of the first paragraph of the new page, change "Figures 3.4-2 and 3.4-3" to "Figures 3.4-2, 3.4-4, and 3.4-6." Add a new third paragraph to read: The Low Temperature Overpressure Protection (LTOP) enable temperatures are based upon the recommendations of NUREG-0800 Branch Technical Position (BTP) RSB 5-2, Revision 1, "Overpressurization Protection of Pressurized Water Reactors While Operating at Low Temperatures." BTP RSB 5-2, Revision 1 defines the enable temperature as "the water temperature corresponding to a metal temperature of at least RT_{NDT} + 90°F at the beltline location (1/4t or 3/4t) that is controlling in the Appendix G limit calculations."

3. On Page B3/4 4-8, Table B3/4.4-1, "Reactor Vessel Toughness," the changes are:

In Rows 4, 5, and 6 under the "Temperature of Charpy V-Notch @ 30 ft-lb" column, change "32" to "40," "36" to "40, and "32" to "40," respectively. Under the "Temperature of Charpy V-Notch @ 50 ft-lb" column, change "62" to "70," "64" to "70," and "100" to "80," respectively. Under the "Minimum Upper Shelf Cv energy for Longitudinal Direction-ft lb" column, change "115" to "118," "110" to "116," and "90" to "92," respectively.

In Row 7 under the "Drop Weight Results" column, change "-20" to "-10." In Rows 7 and 9 under the "Temperature of Charpy V-Notch @ 30 ft-lb" column, change "56" to "110" and "44" to "60," respectively. In Rows 7 and 8 under the "Temperature of Charpy V-Notch @ 50 ft-lb" column, change "100" to "135" and "66" to "70," respectively.

In Rows 7, 8, and 9 under the "Minimum Upper Shelf Cv energy for Longitudinal Direction-ft lb" column, change "95" to "94," "113" to "115," and "101" to "105," respectively.

BASIS FOR AND ACCEPTABILITY OF THE REQUEST

The new Unit 3 P-T limits in this proposed change were found to be more restrictive than what is currently being used at Unit 3 based on 1) the test results and analysis of the Unit 3 surveillance capsule withdrawn after 4.33 EFPY, and 2) updated material properties in our response to the March 6, 1992, Generic Letter 92-01, Revision 1, "Reactor Vessel Structural Integrity, 10 CFR 50.54(f)." Therefore, Unit 3 administrative procedures will be revised to require use of the new P-T limits in this license amendment request.

The existing Unit 3 TS RCS P-T limits were calculated using the fluence for 8 EFPY which were based upon the test results and analysis of the first surveillance capsule withdrawn from Unit 2 in September 1987 after 2.85 EFPY. The existing LTOP enable temperatures (302°F for heatup and 267°F for cooldown) were calculated in accordance with Branch Technical Position (BTP) RSB 5-2 Revision 0, "Overpressurization Protection of Pressurized Water Reactors While Operating at Low Temperatures," based upon 10 CFR 50 Appendix G limits at an RCS pressure equal to the pressurizer safety valve setpoint, i.e., 2500 psia.

The proposed Unit 3 P-T limits were calculated using 1) the fluence for 8 EFPY from the test results and analysis of the first surveillance capsule withdrawn from Unit 3 in May 1990 after 4.33 EFPY, and 2) updated material properties evaluated in response to GL 92-01, Revision 1. The proposed Unit 3 P-T limits on the RCS for normal heatup and cooldown, inservice tests, and remote shutdown cooldown are valid through 8 EFPY because the limits conform to the requirements of Appendix G and H to 10 CFR Part 50. The Unit 3 surveillance program also conforms to the requirements of Appendix H to 10 CFR 50. Therefore, these P-T limit changes are acceptable.

The proposed LTOP enable temperatures were calculated in accordance with BTP RSB 5-2, Revision 1. BTP RSB 5-2, Revision 1 defines the LTOP enable temperature as "the water temperature corresponding to a metal temperature of at least RT_{NDT} + 90°F at the beltline location (1/4t or 3/4t) that is controlling in the Appendix G limit calculations." This calculational basis changes the LTOP alignment temperature from 302°F to 265°F. Changing the RCS temperature at which LTOP must be aligned from 302°F to 265°F would not change the results of the most limiting energy addition transient which is driven by the differential temperature between the RCS and the steam generator rather than the RCS initial energy. The energy addition transient analysis accounts for a Reactor Coolant Pump (RCP) start with a temperature difference of 100°F between the RCS and the steam generator. Lowering the LTOP enable temperature would not change the existing 100°F differential RCP start limitations in TSs 3.4.1.3, "Hot Shutdown," and 3.4.1.4.1, "Cold Shutdown-Loops Filled." Therefore, the proposed TS for the LTOP system is bounded by the original analysis and, as such, the LTOP change is acceptable.

This proposed change is consistent with design assumptions for RCS pressure-temperature operational requirements, satisfies the stress limits for cyclic operations, and complies with the requirements of 10 CFR 50 Appendix G.

DISCUSSION

The maximum allowable Reactor Coolant System (RCS) pressure at any temperature is based upon the stress limitations for brittle fracture. TS 3/4.4.8.1, "Reactor Coolant System-Pressure Temperature Limits," provides operational constraints in all modes of reactor operation to ensure that the most stress limiting location in the reactor vessel is not susceptible to brittle failure as a consequence of reactor operations. The neutron-induced embrittlement of the reactor vessel wall also affects the temperature below which Low Temperature Overpressure Protection (LTOP) is required. LTOP is provided by the Shutdown Cooling System (SDCS) Relief Valve. The SDCS Relief Valve must be aligned below the specified temperature to provide assurance that the reactor vessel wall will be operated in the ductile region in accordance with 10 CFR 50 Appendix G during both normal operation and overpressurization events due to equipment malfunction or operator error. The existing TSs require alignment of the SDCS relief valve below the temperature corresponding to the P-T curve pressurizer relief valve setpoint of 2500 psia.

The existing Unit 3 TS RCS P-T limit curves in TS 3/4.4.8, Figures 3.4-2 and 3.4-4, were originally valid until 8 EFPY at an Adjusted Reference Temperature

(ART)) of 92.4°F at the controlling 1/4t vessel location based on the fluence and test results from the Unit 2 surveillance capsule specimen withdrawn after 2.85 EFPY of operation. The existing LTOP enable temperatures are 302°F for heatup and 267°F for cooldown. These temperatures correspond to the allowable temperatures at the pressurizer safety valve setpoint, i.e., 2500 psia, on the 60°F/hr TS heatup and cooldown curves, respectively.

The proposed Unit 3 P-T limit curves in TS 3/4.4.8, Figures 3.4-2, 3.4-4, and 3.4-6 are valid until 8 EFPY with an ART of 141.4°F at the controlling 1/4t vessel location. This 141.4°F ART was based on the updated fluence projections from the Westinghouse Report WCAP-12920, "Analysis of the Southern California Edison Company San Onofre Unit 3 Reactor Vessel Surveillance Capsule Removed from the 97° Location," March 1991, and from updated material properties evaluated in our response to GL 92-01, Revision 1. The proposed change will revise the existing Unit 3 P-T limits for heatup and cooldown in Figures 3.4-2 and 3.4-4. The proposed change also adds P-T limits for Remote Shutdown cooldown operation (Figure 3.4-6). Figure 3.4-6 incorporates a difference in TLUs for pressure between shutdown instruments on the Remote Shutdown panel and those shutdown instruments in the Control Room. The TLUs for temperature for both the Remote Shutdown instruments and the Control Room shutdown instruments are identical.

The proposed amendment changes the LTOP enable temperatures from 302°F to 265°F for heatup and 267°F to 249°F for cooldown during normal operations, and provides an LTOP enable temperature of 249°F for Remote Shutdown operation. These proposed LTOP enable temperatures are based upon the recommendations of NUREG-800 BTP RSB 5-2, Revision 1. These proposed LTOP temperatures also represent the most limiting enable temperatures for normal heatup, normal cooldown, and remote shutdown cooldown operations. Below these LTOP enable temperatures, the SDCS Relief Valve must be aligned during heatup operations and cooldown operations from either the Remote Shutdown panels or the Control Room.

The Minimum Boltup Temperature (MBT), which is used for administrative control, remains at 86°F as presently indicated in TS 3.4.8.1.d. The flux seen in the reactor vessel flange and adjacent regions results in a negligible RT_{NDT} shift. Therefore, the MBT does not change with time.

The effect of the reactor closure flange on P-T limits has been analyzed and determined not to impact the P-T limits. The material correlations in the analysis were based on copper and nickel content in accordance with Regulatory Guide 1.99, Revision 2, "Radiation Embrittlement of Reactor Vessel Materials," May 1988.

Allowable temperatures for various heatup and cooldown rates for operation from 265°F and below were calculated using an RCS pressure of 450 psia. This 450 psia RCS pressure envelops the maximum RCS pressure which could be reached during a postulated overpressurization event for which the LTOP system (SDCS Relief Valve) is aligned. This ensures that with the SDCS Relief Valve aligned from 265°F and below, the proposed heatup and cooldown limits will bound all pressure conditions.

RCS heatup rates with the reactor head bolts tensioned and the RCS cold leg temperature equal to the minimum boltup temperature of 86°F are limited to 14°F/hr. The intersection of the RCS pressure of 450 psia with the 40°F/hr heatup curve provides the temperature (147.4°F) at which the heatup rate can be increased to 40°F/hr. The temperatures for which higher heatup rates are allowed are determined in a similar manner. This methodology determines the minimum RCS temperature required for discrete heatup rate values. A continuous curve of allowable RCS heatup rates versus RCS coolant temperatures is provided in Figure 3.4-3. The minimum temperature at which the heatup rate of 60°F/hr is permitted is 180°F.

The core critical limit curve in Figure 3.4-2 is in accordance with 10 CFR 50 Appendix G, which requires the reactor vessel temperature to be 40°F above the heatup P-T limit when the core is critical. The Lowest Service Temperature (LST) in Figure 3.4-2 is calculated in accordance with ASME Section III, Article NB-2332(b), which requires an LST of RT_{NDT} + 100°F for piping, pumps, and valves. Our calculations, including instrument uncertainties, arrived at an LST of 208°F. Below this LST, 20 percent of the system hydrostatic test pressure cannot be exceeded. Inservice test allowable P-T limits assume hydrostatic pressure tests and RCS inservice leak tests are conducted at isothermal conditions. However, allowance for a 10°F/hr temperature deviation was accounted for in the analysis. Inservice testing is not conducted from the Remote Shutdown panel.

For the RCS P-T limits in Figure 3.4-4, the RCS pressure is decreased from 1200 psia at the LST of 202°F to 680 psia at the new LST of 208°F. The 100°F/hr cooldown curve intersects the 450 psia RCS pressure at 175°F. Below this temperature allowable cooldown rates, based upon an RCS pressure of 450 psia, are provided as a function of RCS temperature in Figure 3.4-5. These cooldown rates range from 7.8°F/hr at 86°F to 100°F/hr at 175°F.

Remote Shutdown cooldown operational limits are depicted in new Figures 3.4-6 and 3.4-7. Figure 3.4-6 provides the P-T limits and Figure 3.4-7 provides the allowable cooldown rates for Remote Shutdown operation to be effective until 8 EFPY. The new Figures 3.4-6 and 3.4-7 provide more conservative limits because they include TLUs for pressure for the shutdown instruments on the Remote Shutdown panel that have been found by analysis to be higher than the TLUs for pressure for the Control Room shutdown instruments. The temperature TLUs for both the Remote Shutdown instruments and the Control Room shutdown instruments are identical.

The results of the transient analysis, i.e., the mass addition transient and the energy addition transient analyses in the Updated Final Safety Analysis Report (UFSAR) Section 5.2.2.11.2, "Design and Analysis," have been reviewed and approved by the NRC. Because there has been no LTOP system hardware or relief pressure setpoint modifications, the previous analyses are valid until 8 EFPY. The UFSAR will be revised to reflect the 1) revised LTOP enable temperatures for heatup and cooldown operations from the Control Room, 2) LTOP enable temperature for cooldown from the Remote Shutdown Panel, and 3) updated material properties evaluated in our response to GL 92-01, Revision 1.

SAFETY ANALYSIS:

The proposed change described above shall be deemed to involve a significant hazards consideration if there is a positive finding in any 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.

   To compensate for any increase in the reactor vessel RT_{NDT} caused by neutron irradiation, limits on pressure-temperature relationships are periodically changed in accordance with 10 CFR 50, Appendix G. This allows the materials for the pressure-retaining components of the reactor coolant pressure boundary to stay within their stress limits during any condition of normal operation, including anticipated operational occurrences and system hydrostatic tests, over its service lifetime.

   The updates to Figures 3.4-2, 3.4-3, 3.4-4, and 3.4-5 incorporate the changes to the P-T limits analyzed using conservative fluence values. The new P-T limit curves (Figures 3.4-6 and 3.4-7) for Remote Shutdown cooldown operation incorporate the higher TLUs for pressure for shutdown instruments on the Remote Shutdown panel as compared to pressure TLUs for Control Room shutdown instruments. The temperature TLUs for both the Remote Shutdown instruments and the Control Room shutdown instruments are identical. These updates maintain margins of safety against nonductile failure of the reactor pressure vessel based on the results of the Unit 3 surveillance capsule analysis and the updated material properties evaluated in response to GL 92-01, Revision 1. Therefore, the proposed change will not involve a significant increase in the probability or consequences of any accident previously evaluated.

   The change to the LTOP enable temperatures is in accordance with NUREG-800 BTP RSB-52, Revision 1. The results of the most limiting energy addition transient which is driven by the differential temperature between the RCS and the steam generator is not changed by this revision to the LTOP. As such the proposed change is bounded by the original analysis. Therefore, the proposed LTOP enable temperature change will not involve a significant increase in the probability or consequences of any 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.

   The proposed change incorporates the change in reactor vessel RT_{NDT} from different irradiation stages to reflect the accumulation of fast neutron exposure. Any increase in RT_{NDT} due to irradiation is compensated for

by limiting pressure-temperature relationships in accordance with 10 CFR 50 Appendix G to ensure pressure-retaining components of the reactor coolant pressure boundary stay within their stress limits over their service lives. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed LTOP enable temperature changes will not create the possibility of a new or different kind of accident from any previously evaluated. All LTOP design basis energy addition and mass addition transients have been previously evaluated and remain bounding. The proposed changes do not result in any system configuration changes which would affect the capability of the SDCS Relief Valve to respond to design basis transients. Operation of the plant in accordance with TSs 3.4.1.3, "Hot Shutdown," and 3.4.1.4.1, "Cold Shutdown-Loops Filled," remain unchanged.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in the margin of safety?

Response: No.

The purpose of the P-T limit curves is to limit thermal stresses induced by the normal load transients, reactor trips, and unit startup and shutdown operations. The proposed revision to the P-T limit curves incorporates the effects of neutron-induced embrittlement in the pressure-retaining component materials to preserve the margin of safety required by 10 CFR 50, Appendix G. Therefore, the proposed change will not involve a significant reduction in the margin of safety.

The proposed LTOP enable temperatures of 265°F for heatup, 249°F for normal and Remote Shutdown cooldown meet the recommendations of NUREG-800 Branch Technical Position RSB 5-2, Revision 1. The proposed LTOP enable temperatures will assure the SDCS Relief Valve will be aligned to the RCS system to mitigate the consequences of low temperature overpressure events. Furthermore, the maximum RCS pressure used in the analysis bounds the worst case scenario of the postulated overpressurization event. Hence, it is assured that the P-T limits will not be exceeded by overpressurization transients. Therefore, the proposed change will not involve a significant reduction in the margin of safety.

SAFETY AND SIGNIFICANT HAZARDS CONSIDERATION 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 a 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.