

## UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA	)	
EDISON COMPANY, <u>ET AL.</u> for a Class 103	)	Docket No.
License to Acquire, Possess, and Use	)	50-362
a Utilization Facility as Part of	)	Amendment
Unit No. 3 of the San Onofre Nuclear	)	Application
Generating Station	)	No 150.

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No 150.

This amendment application consists of Proposed Technical Specification Change No. 476 to Facility Operating License NPF-15. Proposed Technical Specification Change No. 476 is a request to revise TS SRs 3.8.1.14 and 3.8.1.15, "AC Sources - Operating."

The proposed change would temporarily replace SRs 3.8.1.14 and 3.8.1.15 with the SRs that had existed for this testing in the previous (pre-TSIP) TS.

Subscribed on this 14th day of January, 1997.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: 

Dwight E. Nunn  
Vice President

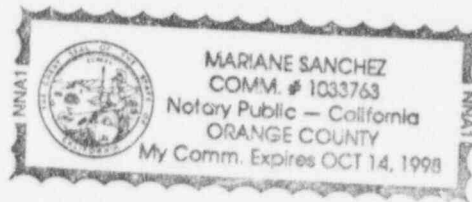
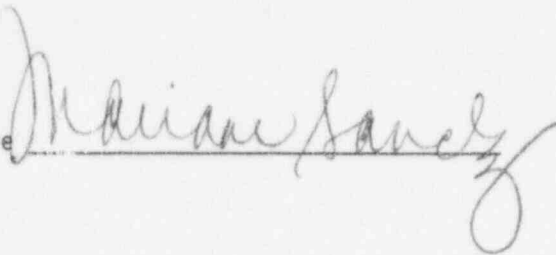
State of California

County of San Diego

On 11/4/97 before me, Mariane Sanchez, personally  
appeared Dwight E. Nunn, personally known to me ~~(or proved to me~~  
~~on the basis of satisfactory evidence)~~ to be the person(s) whose name(s)  
is/~~are~~ subscribed to the within instrument and acknowledged to me that  
he/~~she/they~~ executed the same in his/~~her/their~~ authorized capacity(ies), and  
that by his/~~her/their~~ signature(s) on the instrument the person(s), or the  
entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature



**DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE 476**

This is a request for an exigent Technical Specification (TS) change to revise Surveillance Requirements (SRs) 3.8.1.14 and 3.8.1.15 in TS 3.8.1, "AC Sources - Operating," for SONGS Unit 3.

**Existing SONGS Specifications:**

Unit 3: See Attachment "A"

**Proposed SONGS Specifications:**

Unit 3: See Attachment "B"

**Description of Changes**

**Summary**

The proposed change is requested to temporarily restore the refueling interval diesel generator surveillances as they were prior to their revision as part of NRC Amendment Nos. 127 and 116, for SONGS Units 2 and 3. NRC Amendment Nos. 127 and 116 approved changes to the SONGS Units 2 and 3 Technical Specifications that adopted the recommendations of NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," submitted as part of Proposed Technical Specification Change Number 299 (PCN-299) with exceptions as noted and discussed. This was performed as part of the San Onofre participation as the lead plant for the Combustion Engineering Owners Group (CEOG) in the Technical Specification Improvement Program (TSIP).

The proposed change would temporarily replace Surveillance Requirements (SRs) SR 3.8.1.14 and 3.8.1.15 with the SRs that had existed for this testing in the previous (pre-TSIP) TS.

**Discussion**

Through PCN-299, changes to the SONGS Units 2 and 3 Technical Specifications were

proposed that adopted the recommendations of NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants." These changes included incorporating the revised format of the NUREG, including allowances granted by NUREG-1432, plant specific differences, and to a limited degree, changes to reflect plant specific enhancements. Mainly, the SONGS Units 2 and 3 Technical Specifications were directly transcribed in PCN-299. NRC Amendment Nos. 127 and 116, dated February 9, 1996, approved the changes proposed through PCN-299. Included directly from the NUREG was the imposition of a maximum diesel generator output during the testing described in SRs 3.8.1.14 and 3.8.1.15.

The proposed change would temporarily revise, until performance of the SR to the new (post-TSIP) load limits in the next refueling outage, and prior to return to Mode 4 from the Unit 3 Cycle 9 refueling outage, the specified upper limit for generator output. The generator output of the Emergency Diesel Generator (EDG) is manually adjusted during the SRs by the operator conducting the test. Imposing the Unit 3 NRC Amendment 116 upper limit is less severe on the equipment since this ensures the generator output is at a lower level during the test. Consequently, there is no design consideration not being validated when the old limits are restored. However, as conducted, the previous test results did not ensure that the generator output did not exceed 4700 kW during performance of these SRs, and so the new SRs were not met.

During the TSIP, Edison personnel recognized that the new TS 3.8.1 surveillances contain less rigorous kW loading limitations than were present in the corresponding pre-TSIP TS 3/4.8.1, "A.C. Sources," surveillances and incorrectly believed that the new TS surveillances were therefore satisfied. Consequently, the EDGs were tested to a more rigorous set of performance standards than allowed by the new TSIP SRs. In response to a recent unrelated, but similar problem with SR 3.8.1.9, Edison was in the process of reviewing other diesel generator surveillances to ensure full compliance with the new TSs. During this review, on January 11, 1997, Edison recognized that the existing Unit 3 pre-TSIP surveillances of record did not fully satisfy the new SR 3.3.1.14 and 3.8.1.15 loading requirements.

The delayed implementation until performance of the SRs to the new (post-TSIP) load limits in the next refueling outage, and prior to Mode 4 entry from the Unit 3 Cycle 9 refueling outage is requested to preclude the need to shut down the plant and unnecessarily challenge safety systems and operations. Because the Unit 3 EDGs had passed their previously required, and more rigorous, pre-TSIP surveillances, both EDGs are fully capable of performing their safety functions.

Therefore, there would be no safety benefit in performing the post-TSIP SR, and further, there are no adverse consequences associated with not performing these SRs.

This conclusion is corroborated by probabilistic risk assessment insights which indicate that deferral of the tests until the Unit 3 refueling outage would expose the plant to an increase in risk over that of normal plant operations and would avoid the risks associated with shutting the Unit down to perform these tests.

The change consists of adding notes to SRs 3.8.1.14 and 3.8.1.15, and restoring the appropriate provisions from the pre-TSIP SRs. The Bases for SRs 3.8.1.14 and 3.8.1.15 are similarly annotated to defer discussion of the post-TSIP SR output range until implementation of those SRs.

This change would have the effect of restoring the previous diesel generator load limit for a period until performance of the SRs to the new (post-TSIP) load limits in the next refueling outage, and prior to Mode 4 entry from the Unit 3 Cycle 9 refueling outage. After performance of the SRs to the new (post-TSIP) load limits, the TS as modified would revert to the post-TSIP SRs. This conversion to the post-TSIP SRs will occur during the Unit 3 Cycle 9 refueling outage one EDG at a time.

### 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 area

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of any accident previously evaluated?

Response: No

The proposed change would temporarily replace Surveillance Requirements (SRs) SR 3.8.1.14 and 3.8.1.15 with the SRs that had existed for this testing in the Technical Specifications (TSs) prior to the Technical Specification Improvement Program (TSIP).

Operation of the facility would remain unchanged as a result of the proposed changes and no assumptions or results of any accident

analyses are affected. Therefore, the proposed 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 previously evaluated?

Response: No

The proposed change would temporarily replace Surveillance Requirements (SRs) SR 3.8.1.14 and 3.8.1.15 with the SRs that had existed for this testing in the previous (pre-TSIP) TS.

Operation of the facility would remain unchanged as a result of the proposed change. Therefore, the 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

The proposed change would temporarily replace Surveillance Requirements (SRs) SR 3.8.1.14 and 3.8.1.15 with the SRs that had existed for this testing in the previous (pre-TSIP) TS. Acceptance of the pre-TSIP test, using higher generator output, would not deleteriously impact any margin of safety. The generator output of the Emergency Diesel Generator (EDG) is manually adjusted during the SRs by the operator conducting the test. Imposing the post-TSIP upper limit is less severe on the equipment since this ensures the generator output is at a lower level during the test. Similarly, operation of the facility would remain unchanged as a result of the proposed change. Therefore, the 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 and (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change. Moreover, because this action does not involve a significant hazards consideration, it will also not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.