



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 125 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, UNIT 3

DOCKET NO. 50-362

1.0 INTRODUCTION

By application dated January 14, 1997, Southern California Edison Company (SCE or the licensee) requested changes to the Technical Specifications (Appendix A to Facility Operating License No. NPF-15) for San Onofre Nuclear Generating Station, Unit No. 3. The proposed changes would temporarily replace Surveillance Requirements (SRs) 3.8.1.14 and 3.8.1.15 of TS 3.8.1, "Electrical Power Systems," with SRs as they were prior to their revision as part of NRC Amendment No. 116, which was issued on February 9, 1996.

2.0 BACKGROUND

On January 13, 1997, SCE provided its written request for discretionary enforcement from the requirements of SR 3.0.3, for the purpose of delaying implementation of SRs 3.8.1.14 and 3.8.1.15 of TS 3.8.1, "Electrical Power Systems." The enforcement discretion was requested until the NRC could approve on an exigent basis a license amendment which would temporarily revise SRs 3.8.1.14 and 3.8.1.15 of the current TS. In a letter dated January 15, 1997, the NRC documented its granting of the enforcement discretion until the issuance of a TS amendment to resolve this issue.

The need for granting this enforcement discretion, and issuing a follow-up TS amendment, results from an administrative error in the implementation of the Technical Specification Improvement Program (TSIP) approved by the NRC (NRC Amendment No. 116 for SONGS Unit 3, issued February 9, 1996) and implemented by SCE on August 5, 1996. During the TSIP project, SCE personnel recognized that the new SR 3.8.1.14 and SR 3.8.1.15 contained less rigorous kW loading limitations for the emergency diesel generators (EDGs) than were present in the corresponding surveillances contained in pre-TSIP TS 3/4.8.1, "AC Sources," and incorrectly believed that the new TS surveillances were therefore satisfied. SR 3.8.1.14, and its corresponding surveillance

requirement in the pre-TSIP TS, requires that the EDGs successfully operate continuously for at least 24 hours at specified kW levels. SR 3.8.1.15, and its corresponding surveillance requirement in the pre-TSIP TS, requires that the EDGs successfully start within 5 minutes of shutting down the EDG after the EDG has operated greater than or equal to 2 hours at a specified kW level, and achieve certain performance criteria. Specifically, the pre-TSIP TS surveillances required the subject tests to be performed at kW levels equal to or greater than 4700 kW for 22 hours of the 24-hour test run, while the new SRs specify that the EDGs be tested in the range of 4450 kW to 4700 kW for the same specified 22-hour interval. Since the tests conducted during the last refueling outage were performed at kW values slightly in excess of 4700 kW, they do not meet the verbatim requirements of the current SRs (although the EDGs were tested in a more conservative manner under the pre-TSIP surveillance requirements). Therefore, the unit was not in strict compliance with the current TS shortly after their implementation on August 5, 1996. These SRs are required to be performed at a frequency of 24 months, and are usually performed during each refueling outage. On January 11, 1997, the licensee noted that the existing Unit 3 pre-TSIP surveillances of record did not fully satisfy the new SRs 3.8.1.14 and 3.8.1.15, and entered SR 3.0.3 at 8:10 pm EST. SR 3.0.3 states the required actions when a surveillance is not performed within its specified frequency, and allows 24 hours to complete the required testing. Since SR 3.8.1.14 requires that the EDG be continuously operated for 24 hours, SR 3.0.3 could not be complied with. Therefore, the licensee requested relief from performing the tests needed to demonstrate compliance with SRs 3.8.1.14 and 3.8.1.15 until the upcoming scheduled refueling outage. In its granting of enforcement discretion, the staff agreed with the licensee's safety rationale that both EDGs are fully functional and capable of performing their intended safety function, as demonstrated by satisfactory surveillances performed under the more rigorous but different pre-TSIP surveillance kW loading requirements. Granting of the enforcement discretion avoided the risk of an undesirable transient associated with an unnecessary plant shutdown and thus minimized potential safety consequences and operational risks associated with such action.

3.0 EVALUATION

The staff has previously concluded that both the pre-TSIP TS and current TS surveillance requirements, as described above, are acceptable methods for verifying that the EDGs can start and run continuously at full load capability for extended periods of time (at least 24 hours), and for verifying that the EDGs can successfully start soon after an extended run. The pre-TSIP surveillance requirements were based on NUREG-0212, "Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors." The current TS surveillance requirements are based NUREG-1432, "Standard Technical Specifications - Combustion Engineering Reactors," which have replaced NUREG-0212 as the standard TS for nuclear power plants with Combustion Engineering design reactors. The changes to these SRs are based on the recommendations contained in Regulatory Guide (RG) 1.9, "Selection, Design, and Qualification of Diesel-Generator Units Used as Standby (Onsite) Electric Power Systems at Nuclear Power Plants," Revision 3.

The licensee requested approval of this temporary TS amendment due to the lack of verbatim compliance with the kW loading values in SRs 3.8.1.14 and 3.8.1.15 of the current TS. The latest applicable EDG tests were performed in accordance with the pre-TSIP surveillance requirements, and therefore were performed at kW levels greater than the range specified in the current TS surveillance requirements. Testing at the higher kW load values is more demanding on the EDGs, and represent a more conservative test of the capabilities of the EDGs. As stated previously, the SRs were revised in accordance with RG 1.9, Revision 3.

The staff concludes that both EDGs are fully functional and capable of performing their intended safety function. The basis for this is that both Unit 3 EDGs successfully passed the more conservative surveillance requirements contained in the pre-TSIP TS. Therefore, the staff finds acceptable the licensee's proposal to temporarily re-instate the applicable pre-TSIP surveillance requirements into the current TS. The specific 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. These temporary surveillance requirements will be effective until the EDGs can be tested using the provisions of SRs 3.8.1.14 and 3.8.1.15 approved as part of NRC Amendment No. 116. These tests will be conducted during the next Unit 3 refueling outage, currently scheduled to begin on April 5, 1997.

4.0 EXIGENT CIRCUMSTANCES

The Commission's regulations, 10 CFR 50.91, contain provisions for issuance of amendments when the usual 30-day public notice period cannot be met. One type of special exception is an exigency. An exigency is a case where prompt action is required (before the expiration of a 30-day period comment period).

Under such circumstances, the Commission notifies the public in one of two ways: by issuing a Federal Register notice providing an opportunity for hearing and allowing at least two weeks for prior public comments, or by issuing a press release discussing the proposed changes, using the local media. In this case, the Commission used the first approach.

The exigent circumstances for this TS amendment request exist due to the recent discovery of the inappropriate crediting of previous test results to the post-TSIP SRs. Processing this TS amendment request on an exigent basis also ends the need for the Notice of Enforcement Discretion issued by the staff on January 15, 1997, described in Section 2.0 of this evaluation.

The NRC staff has reviewed the circumstances surrounding the amendment request and finds that the circumstances could not have been avoided and the licensee made a timely request for the amendment. Therefore, the staff finds that the license amendment may be issued in an exigent manner pursuant to 10 CFR 50.91(a)(6).

There were no public comments in response to the notice published in the Federal Register.

5.0 BASIS FOR FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards considerations if operation of the facility in accordance with the amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change would temporarily replace SR 3.8.1.14 and SR 3.8.1.15 with the SRs that had existed for this testing in the technical specifications prior to the implementation of NRC Amendment No. 116.

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. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change would temporarily replace SR 3.8.1.14 and SR 3.8.1.15 with the SRs that had existed for this testing in the technical specifications prior to the implementation of NRC Amendment No. 116.

Operation of the facility would remain unchanged as a result of the proposed change. Therefore, the proposed change would not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed change does not involve a significant reduction in a margin of safety.

The proposed change would temporarily replace SR 3.8.1.14 and SR 3.8.1.15 with the SRs that had existed for this testing in the technical specifications prior to the implementation of NRC Amendment No. 116. 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 is manually adjusted during the surveillance requirements 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.

Based upon the above considerations, the staff concludes that the amendment meets the three criteria of 10 CFR 50.92. Therefore, the staff has made a final determination that the proposed amendment does not involve a significant hazards consideration.

6.0 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.

7.0 ENVIRONMENTAL CONSIDERATION

The amendment changes 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. The NRC staff has determined that the amendment involves 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 amendment involves no significant hazards consideration, and there has been no public comment on such finding (62 FR 3536). Accordingly, the amendment meets 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 amendment.

8.0 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.

Principal Contributor: M. Fields, PDIV-2/NRR

Date: February 10, 1997