## SOUTHERN CALIFORNIA EDISON COMPANY, ET AL DOCKET NOS. 50-361 AND 50-362 NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENTS TO

FACILITY OPERATING LICENSES AND OPPORTUNITY FOR HEARING

The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of amendments to Facility Operating License Nos. NPF-10 and NPF-15 issued to Southern California Edison Company (SCE), San Diego Gas and Electric Company, the City of Riverside, California and the City of Anaheim, California (the licensees), for operation of San Onofre Nuclear Generating Station, Units 2 and 3 located in San Diego, California. The requests for amendments were submitted by letters dated December 14, 1987 and January 26, 1988, and identified by you as Proposed Change Numbers 231, 232, 233, 234 and 240. Each proposed change is discussed below.

Proposed Change No. NPF-10/15-231 would revise Figure 3.1-2 of Technical Specification 3/4.1.3.6. "Regulating CEA Insertion Limits." The existing Technical Specification Figure 3.1-2 provides the CEA withdrawal sequence and insertion limits when the Core Operating Limit Supervisory System (COLSS) is in or out of service. The figure also delineates the Short Term and Long Term Steady State Insertion Limits. The revised Technical Specification figure would relax the CEA insertion limits at low power levels (at or below 25% power).

Proposed Change No. NPF-10/15-232 would revise Surveillance Requirement.

4.3.3.2 of Technical Specification 3.3.3.2, "Incore Detectors." The existing Technical Specification defines the operability requirements for the incore detection system. The surveillance requirements identify the system tests and

the frequency with which they are to be performed. These surveillance tests demonstrate the operability of the detection system. The purpose of the Specification is to ensure that the measurements obtained from the use of this system accurately represent the nuclear conditions within the reactor core.

Surveillance Requirement 4.3.3.2(a) requires that the incore detection system be demonstrated operable by performance of a channel check within 24 hours prior to its use if 7 or more days have elapsed sinc the previous check and at least once per 7 days thereafter when required for monitoring the Azimuthal Power Tilt, radial peaking factors, local power density or DNB margin. Thus, the channel check is required weekly independent of the parallel surveillances required for monitoring the other parameters listed above. Technical Specification 3/4.2.2, "Planar Radial Peaking Factors - Fxy," requires that the measured Planar Radial Peaking Factors (Fm xy) shall be less than or equal to the Planar Radial Peaking Factors (FC xy) used in the COLSS and in the Core Protection Calculators (CPC) when the reactor is in Mode 1 (critical) above 20% of rated thermal power. The measured Planar Radial Peaking Factors  $(F^{m} \times y)$  are obtained by using the incore detection system after each fuel loading with thermal power greater than 40% but prior to operation above 70% of rated thermal power, and at least once every 31 Effective Full Power Days (EFPD). Technical Specification 3/4.2.3, "Azimuthal Power Tilt - Tq." requires that the Azimuthal Power Tilt (Tq) be less than or equal to the Azimuthal Power Tilt allowance used in the CPC when the reactor is in Mode 1 above 20% of rated thermal power. Similarly, Surveil-lance Requirement 4.2.3(c) requires that the Azimuthal Power Tilt be determined by using the incore detectors at least once per 31 EFPD to independently confirm the validity of the COLSS calculated Azimuthal Power Tilt. The proposed change to Surveillance Requirement 4.3.3.2(a) would change the frequency of performance of the channel check to within 24 hours of its use if 31 EFPD or more had elapsed since the previous check and at least once per 31 EFPD there-after when required for monitoring the above listed parameters. The proposed change allows verification of incore detector operability to be performed in conjunction with other routine surveillances.

Proposed Change NPF-10/15-233 would revise Technical Specification 3/4.10.2, "Group Height, Insertion and Power Distribution Limits," and Tables 2.2-1 and 3.3-1. Physics testing requires the measurement of various Control Element Assemblies (CEAs) bank reactivity worths at low reactor power levels. This evolution is currently performed under Technical Specification Special Test Exception 3.10.3. However, that specification test exception was written for partial RCS flow conditions which are not applicable during normal physics testing. The more appropriate test exception to be utilized is 3/4.10.2; however, this test exception references footnote (C) to Table 3.3-1. This footnote allows manual bypass of the trip below 5 percent of rated thermal power only for conduct of special test exception 3/4.10.3. Since the Core Protection Calculators (CPCs) are programmed to trip the reactor on abnormal CEA configurations, it is necessary to raise the Plant Protection System (PPS) 10<sup>-4</sup> percent power bistable to 5 percent power. This bistable prevents CPC generated trips from causing a reactor trip below the PPS bistable setpoint. The first part of the proposed change would reference Tables 2.2-1, "Reactor Protective Instrumentation Trip Setpoint Limits," and 3.3-1. "Reactor Protective Instrumentation," in the body of Special Test Exception 3.10.2, thus allowing this exception to be used for physics testing. This part of the change would also modify footnote (5) of Table 2.2-1 to indicate that the bypass setpoint

may be changed during testing pursuant to Special Test Exception 3.10.2. This footnote affects the Local Power Density-High and DNBR-Low entries in the table. Finally, this part of the proposed change would also affect footnote (C) of Table 3.3-1 to indicate that, during testing pursuant to Special Test Exception 3.10.2 (as well as 3.10.3), the trip may be manually bypassed below 5 percent of rated thermal power. This footnote affects the "channels to trip" column for Local Power Density-High, DNBR-Low and the Core Protection Calculator entries in this table.

The second part of Proposed Change 233 would change Surveillance 4.10.2.2. The existing Surveillance 4.10.2.2 requires determination of linear heat rate by monitoring it continuously with the Incore Detector Monitoring System pursuant to the requirements of Specification 4.2.1.3. Specification 4.2.1.3 is a surveillance requirement in Specification 3/4.2 which requires that the Core Operating Limit Supervisory System Margin Alarm be verified to actuate at the specified interval. This part of the proposed Technical Specification change would change surveillance 4.10.2.2 to reference surveillance 4.2.1.2. This surveillance specifies conditions within which linear heat rate is to be determined.

The third part of Proposed Change 233 would change Table 3.3-1 of the Technical Specifications to exempt Control Element Assembly Calculators (CEACs) from Specification 3.0.4. Action 6 of the table requires that, with one CEAC inoperable, operation may continue for up to 7 days provided that at least once per 4 hours each CEA is verified to be within 7 inches (indicated position) of all other CEAs in its group. After 7 days the action allows continued operation provided that certain conditions are met. These conditions are the same as those conditions required for operation when both CEACs are inoperable. Under

the conditions of Action 6b, operation may continue indefinitely. CEA inoperability has in itself the ability to delay plant startup since the specification is not 3.0.4 exempt. An exemption for CEACs from Specification 3.0.4 would preclude this possible startup delay. This part of the proposed change would modify Action 6 of Table 3.3-1 by inserting a Specification 3.0.4 exemption for inoperability of one of both CEACs (thus allowing plant mode changes to be made).

Proposed Change No. NPF-10/15-234 would revise Technical Specification 3/4.5.1, "Safety Injection Tanks". The existing Limiting Condition for Operation (LCO) 3.5.1.d requires that each reactor coolant system safety injection tank be Operable with a nitrogen cover-pressure of between 600 and 625 psig. This requirement in conjunction with other requirements of the LCO ensures that a sufficient volume of borated water will be immediately forced into the reactor core through the cold legs of the Reactor Coolant System (RCS) in the event that the RCS pressure falls below the pressure of the safety injection tanks (SITs). This initial surge of water into the core provides the initial cooling mechanism during large pipe ruptures within the reactor coolant pressure boundary. The proposed change would revise the required upper limit of the nitrogen cover-pressure from 625 psig to 640 psig. This change would prevent possible violation of the pressure limit in the other SITs due to inleakage from the common fill header when one of the tanks is being filled to maintain its pressure within limits. In addition, the proposed change would revise the units of pressure from pounds per square inch gauge (psig) to pounds per square inch absolute (psig). This would make the units of measurement consistent with other units on the control room panel. Finally, the proposed change would delete the Unit 3 Cycle-2 specific lower SIT boron concentration requirement from the Limiting Condition for Operation.

Proposed Change NPF-10/15-240 would revise Technical Specification 3/4.4.4, "Steam Generators." The surveillance requirements for inspection of the steam generator tubes ensure that the structural integrity of this portion of the RCS will be maintained. The program for inservice inspection of steam generator tubes maintains surveillance of the condition of the tubes in the event that there is evidence of mechanical damage or progressive degradation due to design, manufacturing errors, or inservice conditions that lead to corrosion. In SCE's letter dated April 5, 1985, SCE documented the existence of and the corrective action for steam generator tube wear caused by vibration of an internal diagonal support ("batwing wear"). The corrective action program includes a full 100 percent eddy current inspection of all tubes falling within the "batwing wear" area during every refueling outage and the preventative plugging of tubes.

The Technical Specifications currently require that at least 50% of the tubes selected for the routine inservice inspection shall be located in those areas where experience has indicated potential problems. This would require, for a 3% random sample, more than half of the sample be located in the "batwing wear" area which reduces the size of the first random sample throughout the generator to be less than 1.5%. Additionally, since the "batwing wear" area contains tubes which are subject to the known wear mechanism, the sample base may be increased beyond the initial 3%. However, any additional tube inspection would focus exclusively on the problem areas. Thus, although the tubes experiencing "batwing wear" have been enveloped by the aforementioned program, the current Technical Specifications, when applied as written, would effectively reduce the extent of the random sample outside the wear area and cause unnecessary expansion of the steam generator tube inspection sample base into the wear area

for each inservice inspection.

The proposed change would revise the Technical Specification surveillance requirements to require a special "batwing wear" area inspection and remove this area from the general tube sample selection. This increases the random tube selection outside this well-defined area and provides for a better inspection program. In addition, because the wear phenomenon in the "batwing wear" area is well understood, the results would not be included in the inspection results classification. In summary, the proposed change would revise the Technical Specification surveillance requirements to exclude tubes from the "batwing wear" area from the first tube inspection sample base.

Before issuance of the proposed license amendments, the Commission will have made findings required by the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations.

By May 2, 1988, the licensee may file a request for a hearing with respect to issuance of the amendments to the subject facility operating licenses, and any person whose interest may be affected by this proceeding and who wishes to participate as a party in the proceeding must file a written request for hearing and petition for leave to intervene. Request for a hearing and petitions for leave to intervene must be filed in accordance with the Commission's "Rules of Practice for Domestic Licensing Proceedings" in 10 CFR Part 2. If a request for a hearing or petition for leave to intervene is filed by the above date, the Commission or an Atomic Safety and Licensing Board Panel will rule on the request and/or petition, and the Secretary or the designated Atomic Safety and Licensing Board will issue a notice of hearing or an appropriate order.

As required by 10 CFR 2.714, a petition for leave to intervene must set forth with particularity the interest of the petitioner in the proceeding, and how that interest may be affected by the results of the proceeding. The petition should specifically explain the reasons why intervention should be permitted with particular reference to the following factors: (1) the nature of the petitioner's right under the Act to be made a party to the proceeding; (2) the nature and extent of the petitioner's property, financial, or other interest in the proceeding; and (3) the possible effect of any order which may be entered in the proceeding on the petitioner's interest. The petition should also identify the specific aspects(s) of the subject matter of the proceeding as to which petitioner wishes to intervene. Any person who has filed a petition for leave to intervene or who has been admitted as a party may amend the petition without requesting leave of the Board up to fifteen (15) days prior to the first prehearing conference scheduled in the proceeding, but such an amended petition must satisfy the specificity requirements described above.

Not later than fifteen (15) days prior to the first prehearing conference scheduled in the proceeding, a petitioner shall file a supplement to the petition to intervene which must include a list of the contentions which are sought to be litigated in the matter, and the bases for each contention set forth with reasonable specificity. Contentions shall be limited to matters within the scope of the amendments under consideration. A petitioner who fails to file such a supplement which satisfies these requirements with respect to at least one contention will not be permitted to participate as a party.

Those permitted to intervene become parties to the proceeding, subject to any limitations in the order granting leave to intervene, and have the opportunity to participate fully in the conduct of the hearing, including the opportunity to present evidence and cross-examine witnesses.

A request for a hearing or a petition for leave to intervene must be filed with the Secretary of the Commission, U. S. Nuclear Regulatory Commission. Washington, DC 20555, Attention: Docketing and Service Branch, or may be delivered to the Commission's Public Document Room, 1717 H Street, N.W., Washington, DC, by the above date. Where petitions are filed during the last ten (10) days of the notice period, it is requested that the petitioner or representative promptly so inform the Commission by a toll-free telephone call to Western Union at 1-(800) 325-6000 (in Missouri 1-(800) 342-6700). The Western Union operator should be given Datagram Identification Number 3737 and the following message addressed to George W. Knighton: petitioner's name and telephone number; date petition was mailed; plant name; and publication date and page number of this FEDERAL REGISTER notice. A copy of the petition should also be sent to the Office of the General Counsel, U. S. Nuclear Regulatory Commission, Washington, DC 20555, and to Mr. Charles R. Kocher, Esq., Southern California Edison Company, 2244 Walnut Grove Avenue, P.O. Box 800, Rosemead. California 91770 and Orrick, Herrington and Sutcliffe, Attn: David R. Pigott, Esq., 600 Montgomery Street, San Francisco, California S4111, attorneys for the licensees.

Nontimely filings of petitions for leave to intervene, amended petitions, supplemental petitions and/or requests for hearing will not be entertained absent a determination by the Commission, the presiding officer or the presiding Atomic Safety and Licensing Board, that the petition and/or request should be granted based upon a balancing of the factors specified in 10 CFR 2.714 (a)(1)(i)-(v) and 2.714(d).

If a request for hearing is received, the Commission's staff may issue the amendment after it completes it technical review and prior to the

completion of any required hearing if it publishes a further notice for public comment of its proposed finding of no significant hazards consideration in accordance with 10 CFR 50.91 and 50.92.

For further details with respect to this action, see the applications for amendments which are available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, DC, and at the General Library, University of California at Irvine, Irvine, California 92713.

Dated at Rockville, Maryland, this 23rd day of March, 1988.

FOR THE NUCLEAR REGULATORY COMMISSION

Harry Rood, Senior Project Manager Project Directorate V

Division of Reactor Projects - III. IV, V and Special Projects