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. 2 of the San Onofre Nuclear Generating Station	)))))	Docket No. 50-361 Amendment Application No. 165.

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 165.

This amendment application consists of Proposed Technical Specification Change No. NPF-10-475 to Facility Operating License NPF-10. Proposed Technical Specification Change No. NPF-10-475 is a request to delete License Condition 2.C.(19)b, "Shift Manning," and revise Technical Specifications 3.3.1, "Reactor Protective Instrumentation (RPS)-Operating," 3.3.2, "Reactor Protective Instrumentation (RPS)-Shutdown," 3.3.5, "Engineered Safety Features Actuation System (ESFAS) Instrumentation," 3.3.10, "Fuel Handling Isolation Signal (FHIS)," 3.3.11, "Post Accident Monitoring Instrumentation," 3.4.7, "RCS Loops--Mode 5, Loops Filled," 3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System," 3.7.5, "Auxiliary Feedwater (AFW) System," Section 5.5.2.10, "Inservice Testing Program," and Section 5.5.2.11, "Steam Generator (SG) Tube Surveillance Program."

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The proposed change would delete reference to a surveillance requirement, add a note to exclude neutron detectors, delete reference to the bypass function for an ESFAS function, revise the limit specified in Surveillance Requirement (SR) 3.3.10.2 for the required FHIS monitor, correct a typographical error in SR 3.3.10.3, correct the name of an instrument in Table 3.11-1, revise the limit specified in SR 3.4.7.2, clarify the Mode of Applicability in TS 3.4.12.1, revise TS 3.7.5, to remove the Mode 1, 2, and 3 requirements from SRs 3.7.5.3 and 3.7.5.4, correct a typographical error in Section 5.5.2.10, and correct a typographical error and the reporting requirement specified in Section 5.5.2.11.

Subscribed on this 30th day of June, 1997.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: _____
Dwight E. Nunn
Vice President

State of California
County of San Diego
On 6/30/97 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 Mariane Sanchez

MARIANE SANCHEZ
COMM. # 1033763
Notary Public — California
ORANGE COUNTY
My Comm. Expires OCT 14, 1998

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. 149.

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 149.

This amendment application consists of Proposed Technical Specification Change No. NPF-15-475 to Facility Operating License NPF-15. Proposed Technical Specification Change No. NPF-15-475 is a request to revise Technical Specifications 3.3.1, "Reactor Protective Instrumentation (RPS)-Operating," 3.3.2, "Reactor Protective Instrumentation (RPS)-Shutdown," 3.3.5, "Engineered Safety Features Actuation System (ESFAS) Instrumentation," 3.3.10, "Fuel Handling Isolation Signal (FHIS)," 3.3.11, "Post Accident Monitoring Instrumentation," 3.4.7, "RCS Loops--Mode 5, Loops Filled," 3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System," 3.7.5, "Auxiliary Feedwater (AFW) System," Section 5.5.2.10, "Inservice Testing Program," and Section 5.5.2.11, "Steam Generator (SG) Tube Surveillance Program."

The proposed change would delete the license condition related to shift manning requirements, delete reference to a surveillance requirement, add a note to exclude neutron detectors, delete reference to the bypass function for an ESFAS function, revise the limit specified in Surveillance Requirement (SR) 3.3.10.2 for the required FHIS monitor, correct a typographical error in SR 3.3.10.3, correct the name of an instrument in Table 3.11-1, revise the limit specified in SR 3.4.7.2, clarify the Mode of Applicability in TS 3.4.12.1, revise TS 3.7.5, to remove the Mode 1, 2, and 3 requirements from SRs 3.7.5.3 and 3.7.5.4, correct a typographical error in Section 5.5.2.10, and correct a typographical error and the reporting requirement specified in Section 5.5.2.11.

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On 6/30/97 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 _____

MARIANE SANCHEZ
COMM. # 1033763
Notary Public — California
ORANGE COUNTY
My Comm. Expires OCT 14, 1998

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NUMBER NPF-10/15-475

This is a request to delete License Condition 2.C.(19)b, "Shift Manning," for San Onofre Nuclear Generating Station (SONGS) Unit 2, and revise the following Technical Specifications for both SONGS Units 2 and 3:

3.3.1, "Reactor Protective Instrumentation (RPS)-Operating,"
3.3.2, "Reactor Protective Instrumentation (RPS)-Shutdown,"
3.3.5, "Engineered Safety Features Actuation System (ESFAS) Instrumentation"
3.3.10, "Fuel Handling Isolation Signal (FHIS),"
3.3.11, "Post Accident Monitoring Instrumentation,"
3.4.7, "RCS Loops--Mode 5, Loops Filled,"
3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System,"
3.7.5, "Auxiliary Feedwater (AFW) System,"

The proposed change will also revise Section 5.5.2.10, "Inservice Testing Program," and Section 5.5.2.11, "Steam Generator (SG) Tube Surveillance Program" of the Administrative Controls.

Existing SONGS Specifications:

Unit 2: See Attachment "A"

Unit 3: See Attachment "B"

Proposed SONGS Specifications:

Unit 2: See Attachment "C"

Unit 3: See Attachment "D"

Description of Changes

Summary

Proposed Technical Specification Change Number NPF-10/15-475 (PCN-475) addresses modifications to the Technical Specifications for the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 approved by NRC Amendment Nos. 127 and 116. NRC Amendment Nos. 127 and 116 approved Proposed Technical Specification

Change Number NPF-10/15-299 (PCN-299), a license amendment request that adopted the recommendations of NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants."

PCN-475 would delete License Condition 2.C.(19)b, "Shift Manning," for SONGS Unit 2, and revise Technical Specification (TS) 3.3.1, "Reactor Protective Instrumentation (RPS)-Operating," 3.3.2, "Reactor Protective Instrumentation (RPS)-Shutdown," 3.3.5, "Engineered Safety Features Actuation System (ESFAS) Instrumentation," TS 3.3.10, "Fuel Handling Isolation Signal (FHIS)," TS 3.3.11, "Post Accident Monitoring Instrumentation," TS 3.4.7, "RCS Loops--Mode 5, Loops Filled," TS 3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System," 3.7.5, "Auxiliary Feedwater (AFW) System," Section 5.5.2.10, "Inservice Testing Program," and Section 5.5.2.11, "Steam Generator (SG) Tube Surveillance Program," for both SONGS Units 2 and 3.

The proposed change is required to either: reinstate provisions of the SONGS Units 2 and 3 Technical Specifications, revised as part of NRC Amendment Numbers 127 and 116, for SONGS Units 2 and 3, make corrections to the Technical Specifications, or remove information inadvertently added that is not applicable. These changes were identified during preparation of the procedure changes necessary to implement NRC Amendment Nos. 127 and 116, and during the self-assessment performed by Southern California Edison (SCE).

Specifically, the proposed change would delete the SONGS Unit 2 license condition related to shift manning requirements, delete reference to a surveillance requirement, add a note to exclude neutron detectors, revise the limit specified in Surveillance Requirement (SR) 3.3.10.2 for the required FHIS monitor, correct a typographical error in SR 3.3.10.3, correct the name of an instrument in Table 3.11-1, revise the limit specified in SR 3.4.7.2, revise TS 3.7.5, to remove the Mode 1, 2, and 3 requirements from SRs 3.7.5.3 and 3.7.5.4, revise the Mode of Applicability in TS 3.4.12.1, correct a typographical error in Section 5.5.2.10, and correct a typographical error and the reporting requirement specified in Section 5.5.2.11.

Discussion

Through Proposed Technical Specification Change No. NPF-10/15-299 (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 Numbers 127 and 116, dated February 9, 1996, approved the changes proposed through PCN-299.

Proposed Technical Specification Change Number NPF-10/15-475 (PCN-475) addresses modifications to the SONGS Units 2 and 3 Technical Specifications approved by NRC Amendment Numbers 127 and 116. During preparation of the procedure changes necessary to implement NRC Amendment Numbers 127 and 116, and as a result of the self-assessment performed by Southern California Edison (SCE), certain changes were identified.

The proposed change is required to either: reinstate provisions of the SONGS Units 2 and 3 Technical Specifications, revised as part of NRC Amendment Numbers 127 and 116, for SONGS Units 2 and 3, make corrections to the Technical Specifications, or remove information inadvertently added that is not applicable. Changes are proposed that would: 1) Delete License Condition 2.C.(19)b, "Shift Manning," for SONGS Unit 2 only, and revise the following Technical Specifications for both SONGS Units 2 and 3, 2) 3.3.1, "Reactor Protective Instrumentation (RPS)-Operating," 3) 3.3.2, "Reactor Protective Instrumentation (RPS)-Shutdown," 4) 3.3.5, "Engineered Safety Features Actuation System (ESFAS) Instrumentation," 5) 3.3.10, "Fuel Handling Isolation Signal (FHIS)," 6) 3.3.11, "Post Accident Monitoring Instrumentation," 7) 3.4.7, "RCS Loops--Mode 5, Loops Filled," 8) 3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System," 9) 3.7.5, "Auxiliary Feedwater (AFW) System," 10) Section 5.5.2.10, "Inservice Testing Program," and 11) Section 5.5.2.11, "Steam Generator (SG) Tube Surveillance Program."

The following discussion describes the proposed changes in detail.

1) The proposed change would delete SONGS Unit 2 License Condition 2.C.(19)b, "Shift Manning." Since implementation of NRC Amendment Numbers 127 and 116, overtime restrictions identified in License Condition 2.C.(19)b, conflict with the overtime provisions currently specified in the SONGS Units 2 and 3 Topical Report. This conflict is only applicable to SONGS Unit 2 because the license condition is specific to SONGS Unit 2 only. For SONGS Unit 3, the shift manning requirements are specified in the Topical Report. Section 5.2.2.e, contains requirements for administrative controls, the details are now contained in the Topical Report.

   Prior to issuance of NRC Amendment Numbers 127 and 116, overtime restrictions were prescribed for SONGS Unit 2 in License Condition 2.C.(19)b, and for SONGS Unit 3 in Section 6.2.1.f of the Administrative Controls section for SONGS Unit 3. This was a nuance

during the original license issuance for SONGS Unit 2, and was never corrected by moving the overtime restrictions to the Administrative Controls section of the Technical Specifications. The intent was to correct this through Amendment Numbers 127 and 116 which incorporated identical overtime restrictions into Section 5.2.2.e of the Administrative Controls.

Retaining a separate license condition provides no function, is inconsistent with the overtime restrictions specified in the Topical Report, and therefore, should be deleted. This change is solely for clarity and would remove the conflict between the license condition and the Topical Report.

2) TS 3.3.1, "Reactor Protective Instrumentation (RPS)-Operating," would be revised to delete the exception of the power range neutron flux channels from Surveillance Requirement (SR) 3.3.1.7. TS 3.3.1 requires that four RPS trip and operating bypass removal channels for each function covered by this specification be operable in the applicable Modes. SR 3.3.1.7 requires that a channel functional test be performed on each RPS channel, except the power range neutron flux channels. Therefore, the proposed change would delete the exception to SR 3.3.1.7 for the power range neutron flux channels.

3) TS 3.3.2, "Reactor Protective Instrumentation (RPS)-Shutdown," requires that four RPS Logarithmic Power Level-High trip channels and associated instrument and operating bypass channels be operable in Modes 3, 4, and 5 with any Reactor Trip Circuit Breakers closed and any control element assembly capable of being withdrawn. SR 3.3.2.5 requires that the RPS response time be verified within limits every 24 months on a staggered test basis. However, a note should be added to the SR to exclude neutron detectors.

SR 3.3.1.13 of TS 3.3.1 also requires that response time tests be performed every 24 months on a staggered test basis. However, neutron detectors presently are excluded from response time testing in Modes 1 and 2. Therefore, the proposed change will add a note to SR 3.3.2.5 to allow exclusion of neutron detectors from response time testing.

4) TS 3.3.5, "Engineered Safety Features Actuation System (ESFAS) Instrumentation" requires that four ESFAS trip and bypass removal channels for each ESFAS function covered by this specification, be operable. Included as one of these functions is the Recirculation Actuation Signal (RAS). SR 3.3.5.4 requires that a channel calibration of the RAS, including the bypass removal function, be performed. However, a bypass removal function is not part of the RAS design.

A change is required to the SR therefore, to delete the bypass removal function, as it is not a part of the RAS function. This change is an editorial change only as the RAS function does not utilize the bypass removal function.

5) The proposed change would revise TS 3.3.10, "Fuel Handling Isolation Signal (FHIS)." TS 3.3.10 provides protection from radioactive contamination in the spent fuel pool area in the event that a spent fuel element ruptures during handling. As part of the specification, a channel functional test is performed on the required FHIS radiation monitor channel.

Specifically, SR 3.3.10.2 requires that a channel functional test be performed to verify that the setpoint is less than or equal to 6E4 cpm above background. The SR is based on a transcription of the words in NUREG-1432. Under the previous Technical Specification surveillance, the allowable value was specified as "..sufficiently high to prevent spurious alarms/trips, yet sufficiently low to assure an alarm/trip should an inadvertent release occur."

The proposed change would restore the setpoint to "Sufficiently high to prevent spurious alarms/trips, yet sufficiently low to assure an alarm/trip should an inadvertent release occur." There is no compromise to reduce the monitoring and isolation capability of the FHIS. The 6E4 cpm setpoint does not provide adequate margin above and beyond background during a normal refueling outage. Thus, it is prudent to propose a conservative administrative value for the setpoint which can be set greater than the highest ambient background level, but remains well below the calculated monitor response to a fuel handling accident.

In addition, the proposed change would correct a typographical error in SR 3.3.10.3. Currently, the Note to SR 3.3.10.3 specifies that testing of the actuation logic include actuation of each initiation

relay and verification of the proper operation "...of each ignition relay." The word "ignition" should be substituted with the word "initiation."

6) TS 3.3.11, "Post Accident Monitoring Instrumentation," would be revised. Function 6 of Table 3.3.11-1, currently refers to Containment Sump Water Level (wide range). However, function 6 is the combined function of LT9386-1 and 9387-1 for train A, and LT9388-2 and LT9389-2 for Train B. 9386-1 and 9389-2 are the wide range emergency sump level transmitters. 9387-1 and 9388-2 are the containment area level transmitters.

Therefore, the description of the combination cannot be the description of the function of the single transmitter. The Function 6 description is verbatim from the NUREG, and in the PCN-299 submittal, was not modified to be SONGS specific.

7) The proposed change would revise TS 3.4.7, "RCS Loops--Mode 5, Loops Filled." TS 3.4.7 requires at least one of the Shutdown Cooling trains or Reactor Coolant System (RCS) loops to be operable, thus ensuring the necessary circulation in the RCS.

Limiting Condition for Operation (LCO) 3.4.7 requires that the secondary side water level of each steam generator be greater than 50% (wide range). However, SR 3.4.7.2 verifies that the required steam generator secondary side water level is greater than or equal to 50% (wide range). There is an inconsistency between what is specified in the LCO, and what is required to be verified by the surveillance requirement.

Station procedures (S023-3-3.25.1) currently require that the secondary side water level be verified greater than 50%, which is consistent with the LCO. Because the procedure has verified that the water level is greater than 50%, as opposed to greater than or equal to 50%, the requirements of the LCO were always met. The former Specification, TS 3/4.4.1.4.1, "Cold Shutdown--Loops Filled," contained the same inconsistency between the LCO and surveillance requirement.

The proposed change would remove the inconsistency by revising the inequality in the SR to specify that the required steam generator secondary side water level be verified greater than 50% (wide range). This change is for clarity.

Originally, the surveillance was added to allow removal of both shutdown cooling trains from service while in MODE 5, as long as one reactor coolant pump is in operation and both reactor coolant loops are operable. The Technical Specification is very similar to the arrangement in MODE 4 (Specification 3.4.1.3). The major differences between plant conditions in MODE 4 and MODE 5 (loops filled) are: temperature, pressure, and required shutdown margin. It appears that the SR limits were added verbatim to the previous surveillances for the other mode of operability.

8) TS 3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System," would be revised. Specifically, the Applicability would be revised to clarify the Mode 6 condition. The Specification requires in part, that the LTOP System (with Reactor Coolant System (RCS) temperature $\leq$ 256°F) be operable in Mode 6 when the head is on the reactor vessel. However, the Applicability requires clarification, and should read "Mode 6 when the head is on the reactor vessel and the RCS is not vented."

This change is intended to clarify the Applicability of TS 3.4.12.1 in Mode 6. This change is also consistent with the previous requirements of former TS 3/4.4.8.3.1, "Overpressure Protection Systems RCS Temperature $\leq$ 256°F."

9) SR 3.7.5.3 of TS 3.7.5, "Auxiliary Feedwater (AFW) System," requires that each AFW automatic valve actuates to its correct position on an actual or simulated signal when in Mode 1, 2, or 3, except for valves HV-8200 and HV-8201. The Bases, however, for this SR makes it clear that the test is a refueling surveillance which should be performed in Mode 5. The intent of the wording for the SR is to perform the test in Mode 5 in order to demonstrate the operability of the system in Modes 1, 2, and 3.

A similar situation exists for SR 3.7.5.4. The SR specifies that each AFW pump starts automatically on an actual or simulated signal when in Mode 1, 2, or 3. Again, the Bases for this SR makes it clear that the test is a refueling surveillance which should be performed in Mode 5. The intent of the wording for the SR is to perform the test in Mode 5 in order to demonstrate the operability of the system in Modes 1, 2, and 3.

The reference to Modes 1, 2, and 3, should be removed from both SR 3.7.5.3 and SR 3.7.5.4 for clarity. The Bases already states

clearly that this is a refueling interval surveillance. In addition, former TS 3/4.7.1.2.1, "Auxiliary Feedwater System," SR 4.7.1.2.1.1.b.2 and SR 4.7.1.2.1.1.b.3, specified that the surveillances were required to be performed at least once per refueling interval during shutdown.

10) Section 5.5.2.10, "Inservice Testing Program," would be revised to clarify the title of this section and to add appropriate detail to the section. Section 5.5.2.10 applies not only to the Inservice Testing Program, but includes the Inservice Inspection Program as well. The program details are included in the Licensee Controlled Specifications (LCS). The proposed change would revise the section title to clarify that it applies to both the Inservice Testing Program, and the Inservice Inspection Program. The brief description of the program will be expanded to include both the Inservice Testing Program, and the Inservice Inspection Program.

11) Section 5.5.2.11 contains requirements for the Steam Generator (SG) Tube Surveillance Program. As part of those requirements, a table is provided that identifies supplemental sampling requirements for SG tube inspections. However, the table is numbered incorrectly. It is presently numbered 5.2.11-1. The correct table number, as referenced in Section 5.5.2.11, is 5.5.2.11-1. The proposed change would correct the table number.

In addition, under the table heading "Action Required" for both the "1st Sample Inspection" and "2nd Sample Inspection," for result C-3, notification is to be made to the NRC. However, an incorrect reference to 10 CFR 50.72 is made. The proper notification is pursuant to 10 CFR 50.73. Also under the "Action Required" heading for the "1st Sample Inspection" for Result C2, is a typographical error. It is currently written, "Plug defective tubes and inspect an additional 25 tubes in this SG." However, the statement should read, "Plug defective tubes and inspect an additional 2S tubes in this SG."

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 areas:

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

   Proposed Technical Specification Change Number NPF-10/15-475 (PCN-475) addresses modifications to the Technical Specifications for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 approved by NRC Amendment Nos. 127 and 116. NRC Amendment Numbers 127 and 116 approved changes to adopt the recommendations of NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," requested through Proposed Technical Specification Change Number NPF-10/15-299 (PCN-299). The proposed changes were identified during drafting of the procedure changes required to implement NRC Amendment Numbers 127 and 116, and during the self-assessment performed by Southern California Edison (SCE).

   The proposed change is required to either: reinstate provisions of the SONGS Units 2 and 3 Technical Specifications, revised as part of NRC Amendment Numbers 127 and 116, for SONGS Units 2 and 3, make corrections to the Technical Specifications, or remove information inadvertently added that is not applicable.

   Proposed Change 1 would delete License Condition 2.C.(19)b for SONGS Unit 2 only. Presently, overtime restrictions are specified in both the license condition and the Topical Report. Through NRC Amendment Numbers 127 and 116, the shift manning requirements were modified and subsequently moved to the Section 5.5.2.e, with details moved to the Topical Report.

   In addition, in the NRC's Safety Evaluation Report related to the "Issuance of Amendment for San Onofre Nuclear Generating Station, Unit No. 2 (TAC No. M86191) and Unit No. 3 (TAC No. M86192)," dated February 9, 1996, it is stated that the staff has determined on a generic basis, that specific overtime limits need not be specified in technical specifications, as they are not required by

10 CFR 50.36 (c)(5). The staff also concluded that control of this matter through administrative procedures provides reasonable assurance that personnel overtime would not jeopardize safe plant operation and that specific overtime limits and associated procedures could be described in the UFSAR, or other licensee controlled documents incorporated in the UFSAR by reference for which further changes can be made pursuant to 10 CFR 50.59.

Retaining a separate license condition provides no function, is inconsistent with the Topical Report, and therefore, should be deleted. There can be no increase in the probability or consequences of any accident previously evaluated as a result of this change, as the change does not revise or reduce commitments, it is solely for clarity.

Proposed change 2 would revise TS 3.3.1, "Reactor Protective Instrumentation (RPS)-Operating," to delete the exception of the power range neutron flux channels from Surveillance Requirement (SR) 3.3.1.7. TS 3.3.1 requires that four RPS trip and operating bypass removal channels for each function covered by this specification be operable in the applicable Modes. SR 3.3.1.7 requires that a channel functional test be performed on each RPS channel, except the power range neutron flux channels. Therefore, the proposed change would delete the exception to SR 3.3.1.7 for the power range neutron flux channels. Under the former Technical Specifications, the power range neutron flux channels were not exempt from the channel functional test.

Proposed change 3 would revise SR 3.3.2.5 of TS 3.3.2, "Reactor Protective Instrumentation (RPS)-Shutdown." SR 3.3.2.5 requires that the RPS response time be verified within limits every 24 months on a staggered test basis. SR 3.3.1.13 of TS 3.3.1 also requires that response time tests be performed every 24 months on a staggered test basis. However, neutron detectors presently are excluded from response time testing in Modes 1 and 2. Therefore, the proposed change will add a note to SR 3.3.2.5 to allow exclusion of neutron detectors from response time testing. Under the former Technical Specifications, the neutron detectors were exempt from response time testing.

Proposed change 4 would revise SR 3.3.5.4. SR 3.3.5.4 requires that a channel calibration of the Recirculation Actuation Signal (RAS), including the bypass removal function, be performed. However, a

bypass removal function is not part of the RAS design. A change is required therefore, to delete the bypass removal function, as it is not a part of the RAS function. Because the RAS function does not utilize the bypass removal function, eliminating the words from the SR cannot increase the probability or consequences of any accident previously evaluated as a result of this change

Proposed change 5 would revise Technical Specification (TS) 3.3.10, "Fuel Handling Isolation Signal (FHIS)." Specifically, the proposed change would revise the allowable value specified in SR 3.3.10.2 for the required FHIS monitor, from "≤ 6E4 cpm above background," to "Sufficiently high to prevent spurious alarms/trips, yet sufficiently low to assure an alarm/trip should an inadvertent release occur."

The 6E4 cpm setpoint does not provide adequate margin above and beyond background during a normal refueling outage. Thus, the proposed setpoint, which can be set greater than the highest ambient background level, but remains well below the calculated monitor response to a fuel handling accident, would provide that margin, and was previously specified in the former Technical Specifications.

The proposed change would permit relocation of the allowable value for the monitors from the Technical Specifications to the administrative control procedures. This change is consistent with the existing Containment Airborne Radiation Monitor Specification. This change will not prevent the radiation monitors from performing their intended function following a design basis accident.

The consequences of a Fuel Handling Accident inside the FHB have been evaluated, assuming no FHB isolation. The results of the calculation indicated off-site, and control room doses with control room isolation within three minutes, are well within the limits established by the NRC guidelines.

Compliance with this statement would provide suitable confirmation that the monitors will be capable of performing their intended function, and is further justified by the fact that no credit was given to the monitors in the radiological dose analysis.

This change will not involve a significant increase in the probability of any accident previously evaluated because the setpoint is not an accident initiator. The consequences of an accident would not be increased either as the administrative value would be set sufficiently low to assure an alarm/trip should an inadvertent release occur. The actual values would be administratively controlled by quality-affecting procedures (i.e., changes to procedures will be evaluated under 10 CFR 50.59).

In addition, a typographical error in SR 3.3.10.3 would be corrected. The SR Note would be revised to refer to "initiation relay," not "ignition relay." This change will not involve a significant increase in the probability of any accident previously evaluated because it corrects an typographical error only.

Proposed change 6 would revise Function 6 of Table 3.3.11-1. Currently, Function 6 refers to Containment Sump Water Level (wide range). However, Function 6 is the combined function of the wide range emergency sump level transmitters, and the containment area level transmitters. Therefore, the description of the combination should not be the description of the function of the single transmitter. There can be no increase in the probability or consequences of any accident previously evaluated as a result of this change, as the change does not revise or reduce commitments, it is solely for clarity.

Proposed change 7 would revise Surveillance Requirement 3.4.7.2 of TS 3.4.7. The change would remove an inconsistency between what is specified in the Limiting Condition for Operation (LCO), and what is required to be verified by the SR. The proposed change conservatively removes the inconsistency by revising SR 3.4.7.2 to specify that the required steam generator secondary side water level be verified greater than 50% (wide range). This change is for clarity only, and is consistent with existing station procedures and operation of the facility.

Proposed change 8 would revise TS 3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System." Specifically, the Applicability would be revised to clarify the Mode 6 applicability. The Applicability should read "Mode 6 when the head is on the reactor vessel and the RCS is not vented." This change is intended to clarify the Applicability of TS 3.4.12.1 in Mode 6, and also reflects the previous requirements of former TS 3/4.4.8.3.1,

"Overpressure Protection Systems RCS Temperature ≤ 256°F." This change is editorial only and there can be no increase in the probability or consequences of any accident previously evaluated as a result of this change.

Proposed change 9 would revise SR 3.7.5.3 and SR 3.7.5.4 of TS 3.7.5, "Auxiliary Feedwater (AFW) System." Presently, SR 3.7.5.3 requires that AFW automatic valves actuate to their correct position on an actual or simulated signal when in Mode 1, 2, or 3 (except valves HV-8200 and HV-8201) and SR 3.7.5.4 requires that each AFW pump starts automatically on an actual or simulated signal when in Mode 1, 2, or 3. The Bases, however, for these SRs makes it clear that the tests are a refueling surveillance which should be performed in Mode 5. The proposed change will delete the reference to Modes 1, 2, and 3 from both SR 3.7.5.3 and 3.7.5.4.

The intent of the wording for the SR is to perform the test in Mode 5 in order to demonstrate the operability of the system in Modes 1, 2, and 3. This change would also be consistent with the former SRs which previously specified that the surveillances were required to be performed at least once per refueling interval during shutdown. Therefore, there can be no increase in the probability or consequences of any accident previously evaluated as a result of this change.

Proposed change 10 would revise Section 5.5.2.10, "Inservice Testing Program." The change will clarify that this section applies not only to the Inservice Testing Program, but includes the Inservice Inspection Program as well. This change is editorial in that it correctly identifies the intent of this section. As this is an editorial change only, there can be no increase in the probability or consequences of any accident previously evaluated as a result of this change.

Proposed change 11 would revise Section 5.5.2.11 to correct typographical errors. A table is provided that identifies supplemental sampling requirements for steam generator tube inspections. However, the table is numbered incorrectly. The proposed change would correct the table number.

In addition, under the table heading "Action Required" for both the first "1st Sample Inspection" and "2nd Sample Inspection," for result C-3, notification is to be made to the NRC, and an incorrect

reference to 10 CFR 50.72 is made. The proper notification is pursuant to 10 CFR 50.73. The proposed change would correct this reference. Also under the "Action Required" heading for the "1st Sample Inspection" for Result C2, is a typographical error. It is currently written, "Plug defective tubes and inspect an additional 25 tubes in this SG." However, the statement should read, "Plug defective tubes and inspect an additional 2S tubes in this SG." The proposed requirement is consistent with the requirement of the former TS 3/4.4.4, "Steam Generators."

Operation of the facility would remain unchanged as a result of the proposed changes as the changes correct typographical errors. 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 changes would either: reinstate provisions of the former SONGS Units 2 and 3 Technical Specifications, make corrections to the Technical Specifications, or remove information inadvertently added that is not applicable to SONGS Units 2 and 3.

Proposed change 1 deletes the SONGS Unit 2 license condition regarding shift manning requirements as it conflicts with the requirements contained in the revised Technical Specifications and the Topical Report. Operation of the facility would remain unchanged as a result of the proposed changes and could not create the possibility of a new or different kind of accident from any previously evaluated.

Proposed change 2 would revise TS 3.3.1, "Reactor Protective Instrumentation (RPS)-Operating," to delete the exception of the power range neutron flux channels from Surveillance Requirement (SR) 3.3.1.7. SR 3.3.1.7 requires that a channel functional test be performed on each RPS channel, except the power range neutron flux channels. Therefore, the proposed change would delete the exception to SR 3.3.1.7 for the power range neutron flux channels. This change will not create the possibility of a new or different kind of

accident from any previously evaluated.

Proposed change 3 would revise SR 3.3.2.5 of TS 3.3.2, "Reactor Protective Instrumentation (RPS)-Shutdown." SR 3.3.2.5 requires that the RPS response time be verified within limits every 24 months on a staggered test basis. SR 3.3.1.13 of TS 3.3.1 also requires that response time tests be performed every 24 months on a staggered test basis. However, neutron detectors presently are excluded from response time testing in Modes 1 and 2. Therefore, the proposed change will add a note to SR 3.3.2.5 to allow exclusion of neutron detectors from response time testing. The proposed change will not create the possibility of a new or different kind of accident from any previously evaluated.

Proposed change 4 would revise Surveillance Requirement (SR) 3.3.5.4. A change is required to delete the bypass removal function, as it is not a part of the RAS function. Because the RAS function does not utilize the bypass removal function, eliminating the words from the SR cannot create the possibility of a new or different kind of accident from any previously evaluated.

Proposed change 5 revises the FHIS the monitor allowable value. The value would be controlled by administrative procedures. This change would not alter the design and operational interface between the FHIS and existing plant equipment. As such, the monitors would continue to operate and perform their intended safety function to isolate the FHB following a design basis accident as before. In addition, the Note to SR 3.3.10.3 would be corrected to read "...verification of the proper operation of each initiation relay." Therefore, operation of the facility in accordance with this proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Proposed change 6 revises the name of Function 6 of Table 3.3.11-1. Currently, Function 6 refers to Containment Sump Water Level (wide range), and is more correctly specified as the Containment Water Level (wide range). The proposed change cannot create the possibility of a new or different kind of accident from any accident previously evaluated as the change only revises the name of an instrument and is solely for clarity.

Proposed change 7 would remove an inconsistency between what is specified in the LCO, and what is required to be verified by the SR.

The proposed change conservatively removes the inconsistency by revising SR 3.4.7.2 to specify that the required steam generator secondary side water level be verified greater than 50% (wide range). This change is for clarity only, is consistent with existing station procedures, and consistent with operation of the facility. The proposed change cannot create the possibility of a new or different kind of accident from any accident previously evaluated.

Proposed change 8 would revise TS 3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System." Specifically, the Applicability would be revised to clarify the Mode 6 applicability. The Applicability should read "Mode 6 when the head is on the reactor vessel and the RCS is not vented." This change is intended to clarify the Applicability of TS 3.4.12.1 in Mode 6, and also reflects the previous requirements of former TS 3/4.4.8.3.1, "Overpressure Protection Systems RCS Temperature $\leq$ 256°F." This change is editorial only and cannot create the possibility of a new or different kind of accident from any accident previously evaluated.

Proposed change 9 would revise SR 3.7.5.3 and SR 3.7.5.4 of TS 3.7.5, "Auxiliary Feedwater (AFW) System," to delete the requirements that the SRs be performed in Mode 1, 2, or 3. The intent of the wording for the SR is to perform the test in Mode 5 in order to demonstrate the operability of the system in Modes 1, 2, and 3. This change would also be consistent with the former SRs which previously specified that the surveillances were required to be performed at least once per refueling interval during shutdown. Therefore, the proposed change cannot create the possibility of a new or different kind of accident from any accident previously evaluated.

Proposed change 10 would revise Section 5.5.2.10, "Inservice Testing Program." The change will clarify that this section applies not only to the Inservice Testing Program, but includes the Inservice Inspection Program as well. This change is editorial in that it correctly identifies the intent of this section. As this is an editorial change only, and cannot create the possibility of a new or different kind of accident from any accident previously evaluated.

Proposed change 11 would revise Section 5.5.2.11 to correct typographical errors. A table is provided that identifies

supplemental sampling requirements for steam generator tube inspections. Operation of the facility in accordance with this proposed change will not create the possibility of a new or different kind of accident from any 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 changes will either: reinstate provisions of the SONGS Units 2 and 3 Technical Specifications, make corrections to the Technical Specifications, or remove information inadvertently added that is not applicable to SONGS Units 2 and 3. 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.

Proposed change 1 deletes the SONGS Unit 2 license condition regarding shift manning requirements as it conflicts with the requirements contained in the revised Technical Specifications and the Topical Report. The NRC staff has concluded that control of overtime restrictions through administrative procedures provides reasonable assurance that personnel overtime would not jeopardize safe plant operation and that specific overtime limits and associated procedures could be described in the UFSAR, or other licensee controlled documents incorporated in the UFSAR by reference for which further changes can be made pursuant to 10 CFR 50.59. Therefore, the proposed change will not involve a significant reduction in a margin of safety.

Proposed change 2 would revise TS 3.3.1, "Reactor Protective Instrumentation (RPS)-Operating," to delete the exception of the power range neutron flux channels from Surveillance Requirement (SR) 3.3.1.7. SR 3.3.1.7 requires that a channel functional test be performed on each RPS channel, except the power range neutron flux channels. Therefore, the proposed change would delete the exception to SR 3.3.1.7 for the power range neutron flux channels. This change will not involve a significant reduction in a margin of safety.

Proposed change 3 would revise SR 3.3.2.5 of TS 3.3.2, "Reactor Protective Instrumentation (RPS)-Shutdown." SR 3.3.2.5 requires

that the RPS response time be verified within limits every 24 months on a staggered test basis. SR 3.3.1.13 of TS 3.3.1 also requires that response time tests be performed every 24 months on a staggered test basis. However, neutron detectors presently are excluded from response time testing in Modes 1 and 2. Therefore, the proposed change will add a note to SR 3.3.2.5 to allow exclusion of neutron detectors from response time testing. The proposed change will not involve a significant reduction in a margin of safety.

Proposed change 4 would delete the bypass removal function, as it is not a part of the RAS function. Because the RAS function does not utilize the bypass removal function, eliminating the words from the SR cannot involve a significant reduction in a margin of safety.

Proposed change 5 would revise the FHIS monitor allowable values and would not alter the existing margin of safety. The change would only relinquish control of the allowable values from the TSs to quality-affecting (changes will require a 10 CFR 50.59 evaluation) procedures. In addition, the proposed change would correct a typographical error in the Note to SR 3.3.10.3. Therefore, operation of the facility will not involve a significant reduction in a margin of safety.

Proposed change 6 revises the name of Function 6 of Table 3.3.11-1. Currently, Function 6 refers to Containment Sump Water Level (wide range), and is more correctly specified as the Containment Water Level (wide range). The proposed change cannot involve a significant reduction in a margin of safety.

Proposed change 7 would remove an inconsistency between what is specified in the LCO, and what is required to be verified by the SR. The proposed change conservatively removes the inconsistency by revising SR 3.4.7.2 to specify that the required steam generator secondary side water level be verified greater than 50% (wide range). This change is consistent with existing station procedures, and consistent with operation of the facility. The proposed change cannot involve a significant reduction in a margin of safety.

Proposed change 8 would revise TS 3.4.12.1, "Low Temperature Overpressure Protection (LTOP) System." Specifically, the Applicability would be revised to clarify the Mode 6 applicability. The Applicability should read "Mode 6 when the head is on the reactor vessel and the RCS is not vented." This change is intended

to clarify the Applicability of TS 3.4.12.1 in Mode 6, and also reflects the previous requirements of former TS 3/4.4.8.3.1, "Overpressure Protection Systems RCS Temperature $\leq$ 256°F."

Proposed change 9 would revise SR 3.7.5.3 and SR 3.7.5.4 of TS 3.7.5, "Auxiliary Feedwater (AFW) System," to delete the requirements that the SRs be performed in Mode 1, 2, or 3. The intent of the wording for the SR is to perform the test in Mode 5 in order to demonstrate the operability of the system in Modes 1, 2, and 3. Therefore, the proposed change cannot involve a significant reduction in a margin of safety.

Proposed change 10 would revise Section 5.5.2.10, "Inservice Testing Program." The change will clarify that this section applies not only to the Inservice Testing Program, but includes the Inservice Inspection Program as well. This change is editorial in that it correctly identifies the intent of this section. This is an editorial change only.

Proposed change 11 would revise Section 5.5.2.11 to correct typographical errors. Operation of the facility would remain unchanged as a result of the proposed changes and could not create the possibility of a new or different kind of accident from any previously evaluated.

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.