

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA)	
EDISON COMPANY, <u>ET AL.</u> for a Class 103)	Docket No. 50-361
License to Acquire, Possess, and Use)	
a Utilization Facility as Part of)	Amendment Application
Unit No. 2 of the San Onofre Nuclear)	No. 173
Generating Station)	

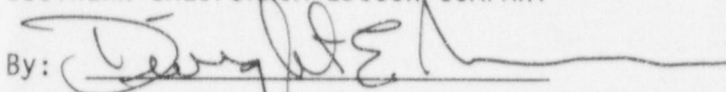
SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 173. This Amendment Application consists of Proposed Change Number 485 (PCN 485) to Facility Operating License No. NPF-10. PCN 485 adds a Surveillance Requirement to Technical Specification 3.3.9, "Control Room Isolation Signal (CRIS)." The new Surveillance Requirement provides for response time testing of CRIS.

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Subscribed on this 20th day of October, 1998.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: 

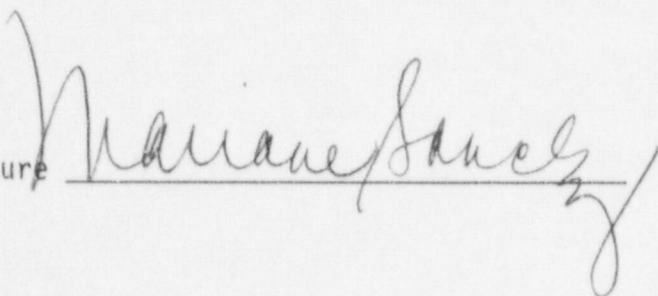
Dwight E. Nunn
Vice President

State of California

County of San Diego

On 10/20/98 before me, Mariane Sanchez, personally
appeared Dwight E. Nunn, 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 



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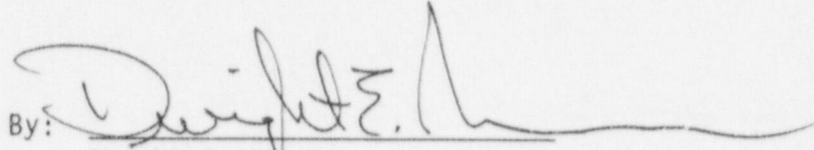
Application of SOUTHERN CALIFORNIA)	
EDISON COMPANY, <u>EI AL.</u> for a Class 103)	Docket No. 50-362
License to Acquire, Possess, and Use)	
a Utilization Facility as Part of)	Amendment Application
Unit No. 3 of the San Onofre Nuclear)	No. 159
Generating Station)	

SOUTHERN CALIFORNIA EDISON COMPANY, EI AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 159. This Amendment Application consists of Proposed Change Number 485 (PCN 485) to Facility Operating License No. NPF-15. PCN 485 adds a Surveillance Requirement to Technical Specification 3.3.9, "Control Room Isolation Signal (CRIS)." The new Surveillance Requirement provides for response time testing of CRIS.

Subscribed on this 20th day of October, 1998.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: 
Dwight E. Nunn
Vice President

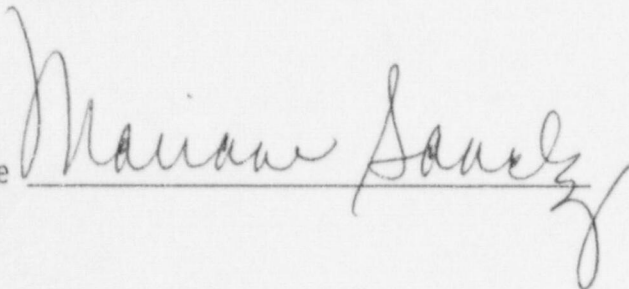
State of California

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Signature 

**DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NUMBER 485**

This is a request to revise Section 3.3.9, "Control Room Isolation Signal (CRIS)" of the Technical Specifications for San Onofre Nuclear Generating Station Units 2 & 3.

Existing Technical Specification

Unit 2: See Attachment "A"
Unit 3: See Attachment "B"

Proposed Technical Specification

Unit 2: See Attachment "C" (red line and strikeout)
Unit 3: See Attachment "D" (red line and strikeout)

Proposed Technical Specification

Unit 2: See Attachment "E"
Unit 3: See Attachment "F"

Proposed Bases (for information)

Unit 2: See Attachment G
Unit 3: See Attachment H

Description of Changes

Summary

Presently Technical Specification Section 3.3.9, "Control Room Isolation Signal (CRIS)." does not require a response time surveillance test for the Control Room Airborne Radiation Monitors, 2/3RE7824-1 and 2/3RE7825-2.

A surveillance that tests the time it takes to isolate the control room after an automatic high radiation generated CRIS and a Safety Injection Actuation Signal (SIAS) generated CRIS is needed to ensure compliance with the design basis.

This proposed change will add a Surveillance Requirement (SR 3.3.9.6) to verify CRIS response time is within limits. The surveillance will ensure that the train actuation response time is less than or equal to the maximum time assumed in the analyses. A time limit to isolate the control room is needed to ensure compliance with 10 CFR Part 50 Appendix A General Design Criterion (GDC) 19.

Discussion

10 CFR 50 Appendix A, GDC 19 requires that: "Adequate radiation protection shall be provided to permit access to and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of 5 rem whole body, or its equivalent to any part of the body, for the duration of the accident."

Section C.2.i of NRC Regulatory Guide 1.52 states: "Unless the applicable engineered-safety-feature atmosphere cleanup system operates continuously during all times that a Design Basis Accident (DBA) can be postulated to occur, the system should be automatically activated upon the occurrence of a DBA by (1) a redundant engineered-safety-feature signal or (2) a signal from redundant Seismic Category 1 radiation monitors."

Safety related, redundant, airborne radiation monitors 2/3RT7824-1 and 2/3RT7825-2 continuously monitor the outside air supply to the control room when the normal HVAC is in service. The monitors are designed in accordance with 10 CFR 50, Appendix A, Section III which specifies the general design criteria for instrumentation that performs Engineered Safety Features Actuation System functions.

If the radioactivity concentration reaches the monitors' trip setpoint value, the monitors will initiate a CRIS which will isolate the normal air conditioning unit and actuate the emergency air conditioning units. In addition, CRIS will be initiated on an SIAS. Actuation of one CRIS channel will close the normal air conditioning unit's isolation dampers, trip the normal air conditioning unit's supply fan, and start the associated train of the redundant emergency air conditioning units to provide filtered outside air to the control room.

Calculations have been issued which model control room isolation following specified DBA's. In order for control room dose requirements to be met, the control room isolation dampers must close within a specified time period.

The following calculation revisions and change notices have been issued to detail the control room isolation model for the DBA's.

- N-4072-001 Rev.4 (CCN-3) FHA Inside FHB-CR & Offsite Doses
- N-4072-003 Rev.2 (CCN-2) FHA Inside Containment-CR & Offsite Doses
- N-4075-004 Rev.2 Doses for Revised SGTR Event
- N-4077-001 Rev.7 (CCN-1) Letdown Line Break Offsite Doses
- N-4060-004 Rev.8 (CCN-3) LOCA-Containment Leakage-CR Dose
- J-SPA-179 Rev.0 Control Room/Fuel Handling Building Monitor Setpoints

The proposed change will add a surveillance test to the Surveillance Requirements of Technical Specification Section 3.3.9. The addition will be "Verify that

response time of required CRIS channel is within limits." The surveillance frequency will be 18 months, which corresponds to the frequency of the CRIS Channel Functional and Calibration tests. The frequency is based on plant operating experience with regard to channel operability, which demonstrates that failure of one or more channels of a given function in any 18 month interval is a rare event. The frequency is also based upon plant operating experience that shows that random failures of instrumentation components causing serious response time degradation, but not channel failure, are infrequent occurrences.

There are no significant safety hazards considerations since this is an addition to the Technical Specifications with the purpose of verifying compliance with 10 CFR Part 50 Appendix A GDC 19.

Revised Bases corresponding to the addition of this Surveillance Requirement are provided for information in Attachments G and H. Licensee Controlled Specification 3.3.100, "RPS/ESFA Response Times," will be updated following NRC approval of this proposed change to include response times for control room isolation for SIAS and for Control Room airborne radiation.

No Significant Hazards Considerations

The Commission has provided standards for determining whether a significant hazards consideration exists as stated in 10 CFR 50.92. A proposed amendment to an operating license for facility involves no significant hazards consideration if operation of the facility in accordance with a proposed 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. A discussion of these standards as they relate to this amendment request follows:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change will maintain the Control Room Isolation Signal (CRIS) operability and surveillance requirements in the Technical Specification. The proposed change only adds response time testing. The probability of an accident and the consequences of an accident are unaffected by this proposed change since the Safety Analysis remains unaffected. Therefore, operation of the facility in accordance with this change will not involve an increase in the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

Addition of response time testing will not alter the design and operational interface between the CRIS instrumentation and existing plant equipment. The monitors will continue to operate and perform their intended safety function to isolate the control room following a design basis accident as before. 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.

3. Involve a significant reduction in a margin of safety?

Response: No

This proposed change will not affect the margin of safety since this is an addition to the Technical Specifications with the purpose of verifying compliance with 10 CFR Part 50 Appendix A General Design Criterion 19. Addition of response time testing will verify this specific margin of safety.

Based on the responses to these three criterion, Southern California Edison (SCE) has concluded that the proposed amendment involves no significant hazards consideration.

Environmental Consideration:

SCE has determined that the proposed amendment involves no changes in the amount or type of effluent that may be released offsite, and results in no increase in individual or cumulative occupational radiation exposure. As described above, the proposed Technical Specification amendment involves no significant hazards consideration and, as such, meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9).

ATTACHMENT "A"
EXISTING SPECIFICATIONS
UNIT 2