



SOUTHERN CALIFORNIA  
**EDISON**

An EDISON INTERNATIONAL<sup>SM</sup> Company

Dwight E. Nunn  
Vice President

August 13, 1999

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

Subject: **Docket Nos. 50-361 and 50-362**  
**Response to Request for Additional Information Regarding**  
**Proposed Technical Specification Change Number 485**  
**San Onofre Nuclear Generating Station Units 2 and 3**

Reference: Letter dated October 20, 1998, from D. E. Nunn (SCE) to  
Document Control Desk (NRC), Subject: Docket Nos 50-361 and  
50-362, Proposed Technical Specification Change Number 485,  
San Onofre Nuclear Generating Station Units 2 and 3

Gentlemen:

Provided as an enclosure is a response to an NRC request for additional information regarding Southern California Edison's (SCE's) license Amendment Applications 173 and 159 for San Onofre Nuclear Generating Station, Units 2 and 3, respectively. These Amendment Applications consist of Proposed Change Number 485 (PCN 485) to the San Onofre Units 2 and 3 Technical Specifications which requests addition of a Surveillance Requirement to Technical Specification 3.3.9, "Control Room Isolation Signal (CRIS)."

If you have any questions on this subject, please contact me or Jack Rainsberry at (949) 368-7420.

Sincerely,

Enclosure

ADDI'l

9908170183 990813  
PDR ADOCK 05000361  
P PDR

P. O. Box 128  
San Clemente, CA 92674-0128  
949-368-1480  
Fax 949-368-1490

cc: E. W. Merschoff, Regional Administrator, NRC Region IV  
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3  
L. Raghavan, NRC Project Manager, San Onofre Units 2 and 3  
S.Y. Hsu, California Department of Health Services

Subscribed on this 13th day of August, 1999.

Respectfully submitted,  
SOUTHERN CALIFORNIA EDISON COMPANY

By: Dwight E. Nunn

Dwight E. Nunn  
Vice President

State of California

County of San Diego

On 8/13/99 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 Mariane Sanchez





ENCLOSURE  
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
REGARDING PROPOSED TECHNICAL SPECIFICATION  
CHANGE NUMBER 485

**NRC Question:**

What will the Surveillance Requirement be for response time testing of the Control Room Isolation Signal (CRIS), and what is the basis for acceptability?

**Southern California Edison Response:**

The response time which will be used in the Licensee Controlled Specification (LCS) 3.3.100 Surveillance Requirement for the CRIS will be two (2) minutes. The surveillance frequency will be 18 months.

The basis for acceptability is as follows:

The response time is composed of the sample transport time from the control room normal ventilation intake louvers to the radiation monitor detector, the electronic response time of the radiation monitor, and the damper closure time, plus engineering margin.

For transients which generate a Safety Injection Actuation Signal (SIAS) initiated CRIS prior to a significant activity release, the Control Room dose calculations may assume that the Control Room will isolate before the radioactive release reaches the control room normal ventilation intake louvers.

For transients which generate a significant activity release prior to a SIAS initiated CRIS, and for transients without a SIAS initiated CRIS, Control Room dose calculations currently assume, if necessary, that the Control Room is isolated on a high radiation initiated CRIS within three (3) minutes of the radioactive release reaching the control room normal ventilation intake louvers.

The limiting Control Room dose calculation which assumes that the Control Room is isolated within three (3) minutes is currently the Letdown Line Break with a pre-existing iodine spike. The resulting Control Room doses are 25.4 Rem Thyroid, 0.7 Rem Beta-Skin, and < 0.1 Rem Whole Body.

LCS Table 3.3.100-2, Emergency Safety Feature Actuation System (ESFAS), response time is planned to be conservatively set at 120 seconds for the electronic response time of the radiation monitor and the damper closure time. The remaining 60 seconds of the three (3) minute required Control Room isolation time is allocated to the sample transport time from the control room normal ventilation intake louvers to the radiation monitor detector. The analysis of record shows the transport time from louvers to radiation detector to be less than 15 seconds, allowing a 45 second margin.

The proposed 18 month surveillance frequency for the CRIS response time test is consistent with the other CRIS surveillance frequencies.