

November 16, 1999

Mr. Harold B. Ray
Executive Vice President
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2, AND 3 - PUBLIC NOTICE OF APPLICATION FOR AMENDMENT TO FACILITY OPERATING LICENSE (TAC NOS. MA7123 AND MA7124)

Dear Mr. Ray:

The enclosed announcement was forwarded to the *Orange County Register* for publication. This announcement relates to your application dated November 10, 1999, for amendments to the Facility Operating Licenses No. NPF-10 and NPF-15 for the San Onofre Nuclear Generating Station, Units 2, and 3, respectively. The proposed amendments would modify the Technical Specification Limiting Condition For Operation 3.4.9.b to delete the phrase stating that two groups of pressurizer heaters be "capable of being powered from an emergency power supply."

Sincerely,

/s/

L. Raghavan, Senior Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-361, and 50-362

Enclosure: Public Notice

cc w/encl: See next page

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PUBLIC NOTICE

NRC STAFF PROPOSES TO AMEND OPERATING LICENSE FOR THE SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2, AND 3

The U.S. Nuclear Regulatory Commission (NRC) has received an application dated November 10, 1999, from the Southern California Edison Company (the licensee) for exigent amendments to the operating licenses for the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, located in San Diego County, CA.

The proposed amendments are being processed on an exigent basis to avoid an unnecessary delay in performing a scheduled preventative maintenance on the emergency diesel generator. If approved, these amendments would revise the Limiting Condition for Operation (LCO) 3.4.9.b of Technical Specification (TS) 3.4.9, "Pressurizer," to delete the phrase stating that two groups of pressurizer heaters be "capable of being powered from an emergency power supply." This phrase was inappropriately retained in the TS from the standard TS for Combustion Engineering plants.

In its submittal, the licensee discussed the need for an exigent review of the proposed license amendments. The licensee stated that it interpreted the requirement for pressurizer heater power "capable of being powered from an emergency power supply" to mean "powered from a class 1E bus." Recent conversations with NRC staff in conjunction with planning for online maintenance of the diesel generators (DGs) scheduled to begin November 29, 1999, have shown that these words can be interpreted to mean "from an OPERABLE diesel generator." The licensee stated that prior to that time it was not aware of this alternate interpretation and is not creating an exigency to take advantage of the regulation in this respect. The proposed TS change will not result in a change to the design of the plant. These pressurizer heaters will continue to be powered from the 1E buses and meet the requirements of NUREG-0737, item II.E.3.1, "Emergency Power Supply For Pressurizer Heaters."

Because planning for the DG outages is far advanced and the scheduled preventive maintenance is due, it is impractical to delay the scheduled maintenance while the NRC pursues the normal public notice process. Therefore, the licensee is requesting NRC review and approval of PCN-510 on an exigent basis.

Consequently, the NRC staff has determined that exigent circumstances exist and it must act quickly and that time does not permit for the NRC to provide the normal 30 days for prior public comment.

The licensee and the NRC have evaluated the proposed change with regard to the determination of whether or not a significant hazards consideration is involved. According to 10 CFR 50.92(c), this means that operation of SONGS in accordance with the proposed amendments would not involve a significant increase in the probability or consequences of an accident previously evaluated, would not create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. The licensee's evaluation is presented below:

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

The proposed change would delete the phrase in Limiting Condition For Operation (LCO) 3.4.9.b that the pressurizer heaters be "capable of being powered from an emergency power supply." The Bases for Technical Specification 3.4.9 state that safety analyses presented in the Updated Final Safety Analysis Report do not take credit for pressurizer heater operation. Therefore, the consequences of any accident previously evaluated are not increased by the proposed change. The pressurizer heaters are not themselves a credible initiator of any accident, and the requested amendment makes no change to the heaters themselves, so the probability of an accident will not be increased. Therefore, the probability or consequences of any accident previously evaluated will not be increased by the proposed change.

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 accident previously evaluated?

Response: No

This amendment request does not involve any change to plant equipment or operation. It is a request to bring the Technical Specifications (TS) for San Onofre Nuclear Generating Station Units 2 and 3 (SONGS 2 & 3) into agreement with NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants." Deleting the phrase "capable of being powered from an emergency power supply" 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

This amendment does not change the manner in which safety limits or limiting safety settings are determined. The Bases for TS 3.4.9 state that, while pressurizer heaters are needed to maintain subcooling in the long term to maintain natural circulation of the reactor coolant after a loss of offsite power, maintaining hot, high pressure conditions over an extended time period is not evaluated in the accident analyses. The heaters will continue to be powered from class 1E buses under all conditions, as designed. SONGS 2 & 3 will continue to meet the requirements of section II.E.3.1, "Emergency Power Supply For Pressurizer Heaters," of NUREG-0737, "Clarification of TMI Action Plan Requirements." Therefore, the proposed change will not involve a significant reduction in a margin of safety.

Following an initial review of this application, the requested amendments have been evaluated against the standards of 10 CFR 50.92 and the NRC staff has made a proposed (preliminary) determination that the amendment request involves no significant hazards consideration. Under NRC regulations, this means that the proposed changes do not significantly increase the probability or consequences of any previously evaluated accident, nor create the possibility of a new or different kind of accident, nor significantly reduce any margin of safety.

If the proposed determination that the requested license amendments involve no significant hazards consideration becomes final, the staff will issue the amendments without first offering an opportunity for a public hearing. An opportunity for a hearing will be published in the *Federal Register* at a later date and any hearing request will not delay the effective date of the amendments.

If the staff decides in its final determination that the amendments do involve a significant hazards consideration, a notice of opportunity for a prior hearing will be published in the *Federal Register* and, if a hearing is granted, it will be held before the amendments are issued.

Comments on the proposed determination of no significant hazards consideration may be (1) telephoned to Stephen Dembek, Section Chief, Project Directorate IV, by collect call to 1-301-415-1455, or by facsimile to 1-301-415-2102, (2) e-mailed to SXD@nrc.gov, or (3) submitted in writing to the Chief, Rules and Directives Branch, Division of Administrative Services, Office of Administration, U.S. Nuclear Regulatory Commission, Washington, DC 20555. All comments received by close of business on November 19, 1999, including all telephoned or e-mailed comments received by 4:15 p.m. Eastern Standard Time on November 19, 1999, will be considered in reaching a final determination.

A copy of the application is available for public inspection at the Commission's Public Document Room, located at the Gelman Building, 2120 L Street, NW., Washington, DC, and accessible electronically through the ADAMS Public Electronic Reading Room link at the NRC Web site (<http://www.nrc.gov>).

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San Onofre Nuclear Generating Station, Units 2 and 3

cc:

Mr. R. W. Krieger, Vice President
Southern California Edison Company
San Onofre Nuclear Generating Station
P. O. Box 128
San Clemente, CA 92674-0128

Chairman, Board of Supervisors
County of San Diego
1600 Pacific Highway, Room 335
San Diego, CA 92101

Alan R. Watts, Esq.
Woodruff, Spradlin & Smart
701 S. Parker St. No. 7000
Orange, CA 92668-4720

Mr. Sherwin Harris
Resource Project Manager
Public Utilities Department
City of Riverside
3900 Main Street
Riverside, CA 92522

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
Harris Tower & Pavilion
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Mr. Michael Olson
San Onofre Liaison
San Diego Gas & Electric Company
P.O. Box 1831
San Diego, CA 92112-4150

Mr. Steve Hsu
Radiologic Health Branch
State Department of Health Services
Post Office Box 942732
Sacramento, CA 94234

Resident Inspector/San Onofre NPS
c/o U.S. Nuclear Regulatory Commission
Post Office Box 4329
San Clemente, CA 92674

Mayor
City of San Clemente
100 Avenida Presidio
San Clemente, CA 92672

Mr. Dwight E. Nunn, Vice President
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128