

Improved Standard Technical Specifications (ISTS) and is based on a study conducted by the Westinghouse Electric Company, on behalf of the Combustion Engineering Owners Group (CEOG) in Topical Report WCAP-15830-P, "Staggered Integrated ESF Testing," and Technical Specification Task Force (TSTF) 450.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change affects only the Frequency at which integrated ESF testing should be performed. This testing provides assurance that the integrated ESF response will occur as assumed in the accident analyses. Testing of the components will continue to be performed as currently specified in the Technical Specifications. The only change will be for the integrated test. This test will continue to be performed on each train of ESF equipment, however, it will be performed on a Staggered Test Basis. This means that the testing will be less frequent than currently required. However, testing seldom shows failure of the equipment to perform its safety function. Because of the complexity of performing the test, the test is most likely to be repeated for some discrepancy in the set up of the test. The detailed risk review and assessment of a longer test interval shows that the change in risk is low or unchanged for equipment covered by the topical report. Licensees will provide acceptable risk reviews for plant specific equipment.

This test does not increase the probability of an accident previously evaluated because it is not a precursor to an accident. In addition, the test is performed in a shutdown mode, where these types of accidents are not assumed to occur. The proposed change also does not increase the consequences of an accident previously evaluated because the equipment is still demonstrated to perform its safety function in an integrated manner. One complete train of equipment will be tested every refueling interval for each train. Successful completion of the test is still required.

Therefore, the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change affects only the Frequency at which integrated ESF testing should be performed. All more frequently performed testing is unaffected by this proposed change. No changes are being made to the equipment or to the method of equipment operation as a result of this

change. No changes are being made to the tests addressed by this proposed change except the frequency.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. The proposed change does not involve a significant reduction in a margin of safety.

The proposed change affects only the surveillance interval at which integrated ESF testing should be performed. It does not impact safety system design criteria; safety system setpoint calculations or assumptions made in the safety analyses. All of the affected systems will continue to perform their safety functions as designed.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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*NRC Section Chief:* Stephen Dembek.

*Southern California Edison Company, et al., Docket Nos. 50-361 and 50-362, San Onofre Nuclear Generating Station, Units 2 and 3, San Diego County, California*

*Date of amendment requests:* July 28, 2003.

*Description of amendment requests:* The proposed amendments would revise Technical Specification 3.3.1, "RPS Instrumentation—Operating," and 3.3.5, "ESFAS Instrumentation." Specifically, the proposed changes would replace the requirement for the Steam Generator Pressure—Low allowable value from its current value of 729 psia to a revised value of 717 psia.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

*Response:* No.

Accidents evaluated in Chapter 15 of the Updated Final Safety Analysis Report use an analytical value of 675 psia for Steam Generator Pressure—Low and for the Main Steam Isolation Signal/Emergency Feedwater Actuation Signal, which is the basis for the proposed change to the allowable value. The current and proposed Allowable Values are

729 psia and 717 psia respectively, which means that a 12 psi reduction in margin between the Allowable Value and the Analytical Value is being proposed. Since the Trip Setpoint may not be below 717 psia (it would be at 725 psia as required by the supporting calculation), the proposed reduction in margin between the Allowable Value and the Analytical Value does not involve a significant increase in the consequences of an accident previously evaluated.

The proposed amendment has no effect on the probability of occurrence of accidents evaluated in Chapter 15 of the Updated Final Safety Analysis Report.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

*Response:* No.

There will be no change to the design basis of the plant. There are no new anticipated operational occurrences, or design basis accidents. No changes to any other analytical limits are being made. The current Analytical Value for Steam Generator Pressure—Low is being retained, and no changes to any of the assumptions in the accident analyses are being proposed.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

*Response:* No.

The change in allowable value will not adversely affect the design analysis. The plant would trip on Steam Generator Pressure—Low at values at, or above, the analysis limit. The proposed change in the Allowable Value does not involve any change to the Analytical Value, so that the design bases limit is maintained.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Southern California Edison concludes that the proposed amendments present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment requests involve no significant hazards consideration.

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