November 2, 19

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

ISSUANCE OF AMENDMENT FOR SAN ONOFRE NUCLEAR GENERATING STATION, SUBJECT: UNIT NO. 2 (TAC NO. M93074) AND UNIT NO. 3 (TAC NO. M93075)

Dear Mr. Ray:

The Commission has issued the enclosed Amendment No. 126 to Facility Operating License No. NPF-10 and Amendment No. 115 to Facility Operating License No. NPF-15 for San Onofre Nuclear Generating Station, Unit Nos. 2 and 3. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated August 1, 1995, and as supplemented by letter dated October 18, 1995.

These amendments revise Technical Specification (TS) 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation," Table 3.3-3. Table 3.3-3 includes the requirements for the minimum number of toxic gas isolation system (TGIS) trains operable. These amendments are a one-time-only change to extend the allowed TGIS outage times during replacement of the existing TGIS instrumentation.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely.

Original Signed By

Me] B. Fields, Project Manager Project Directorate IV-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

DICTOIDUTION

Docket Nos.	50-361 and 50-362	Distribution Docket File	FPevton
Enclosures:	 Amendment No. 126 to NPF-10 Amendment No. 115 to NPF-15 Safety Evaluation 	PUBLIC LHurley, RIV JRoe WBateman	GHill (4), T5C3 KPerkins, RIV/WCFO PDIV-2 Reading OGC, 015B18
cc w/encls:	See next page	CGrimes, OllE22 MFields EAdensam	ACRS, T2E26 CMcCracken EABrown
DOCUMENT NAM	1F• 5093074 AMD	CHawes (SE) JBianchi, WCFO/RIV RHuev, WCFO/RIV	(2)

DOCUMENT NAME: S093074.AMD

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OFC	PD4-2	PD4-2	PD4-2	SRL/R/)	EMCB-12	OGC ESS
NAME	EPeyton	EABrown:pk	MFields	JLyons	RHermann	RBachmann
DATE	10/17/95	10/ /95	10/18/95	10/23/95	10/23/95	10/-25/95

OFFICIAL RECORD COPY

November 2, 5

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

SUBJECT: ISSUANCE OF AMENDMENT FOR SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NO. 2 (TAC NO. M93074) AND UNIT NO. 3 (TAC NO. M93075)

Dear Mr. Ray:

The Commission has issued the enclosed Amendment No. 126 to Facility Operating License No. NPF-10 and Amendment No. 115 to Facility Operating License No. NPF-15 for San Onofre Nuclear Generating Station, Unit Nos. 2 and 3. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated August 1, 1995, and as supplemented by letter dated October 18, 1995.

These amendments revise Technical Specification (TS) 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation," Table 3.3-3. Table 3.3-3includes the requirements for the minimum number of toxic gas isolation system (TGIS) trains operable. These amendments are a one-time-only change to extend the allowed TGIS outage times during replacement of the existing TGIS instrumentation.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly <u>Federal Register</u> notice.

Sincerely,

Original Signed By

Mel B. Fields, Project Manager Project Directorate IV-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Docket Nos.	50-36	51 and 50-362	DISTRIBUTION	50 J
Enclosures:	1. 2. 3.	Amendment No. 126 to NPF-10 Amendment No. 115 to NPF-15 Safety Evaluation	Docket File PUBLIC LHurley, RIV JRoe WBateman	EPeyton GHill (4), T5C3 KPerkins, RIV/WCFO PDIV-2 Reading OGC, 015B18
cc w/encls:	See	next page	CGrimes, OllE22 MFields FAdensam	ACRŚ, T2E26 CMcCracken FABrown
DOCUMENT NAM	IE:	S093074.AMD	CHawes (SE) JBianchi, WCFO/RIV RHuey, WCFO/RIV	JStrosnider (2)

OFC	PD4-2	PD4-2	PD4-2	SPL/B/)	EMCB-12	0GC. 09.0
NAME	EPeyton	EABrown:pk	MFields	JLyons	RHermann	RBychmann
DATE	10/17/95	10/ /95	10//8/95	10/23/95	10/23/95	10/-25/95

OFFICIAL RECORD COPY



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 2, 1995

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

SUBJECT: ISSUANCE OF AMENDMENT FOR SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NO. 2 (TAC NO. M93074) AND UNIT NO. 3 (TAC NO. M93075)

Dear Mr. Ray:

The Commission has issued the enclosed Amendment No. 126 to Facility Operating License No. NPF-10 and Amendment No. 115 to Facility Operating License No. NPF-15 for San Onofre Nuclear Generating Station, Unit Nos. 2 and 3. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated August 1, 1995, and as supplemented by letter dated October 18, 1995.

These amendments revise Technical Specification (TS) 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation," Table 3.3-3. Table 3.3-3 includes the requirements for the minimum number of toxic gas isolation system (TGIS) trains operable. These amendments are a one-time-only change to extend the allowed TGIS outage times during replacement of the existing TGIS instrumentation.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly <u>Federal Register</u> notice.

Sincerely,

Mel B. Fields

Mel B. Fields, Project Manager Project Directorate IV-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosures: 1. Amendment No.126 to NPF-10

- 2. Amendment No.115 to NPF-15
 - 3. Safety Evaluation

cc w/encls: See next page

Mr. Harold B. Ray

- 2 -

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

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

Alan R. Watts, Esq. Rourke & Woodruff 701 S. Parker St. No. 7000 Orange, California 92668-4702

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

Dr. Harvey Collins, Chief Division of Drinking Water and and Environmental Management California Department of Health Services P. O. Box 942732 Sacramento, California 94234-7320

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

Mr. Richard Krumvieda Manager, Nuclear Department San Diego Gas & Electric Company P.O. Box 1831 San Diego, California 92111

Mr. Steve Hsu Radiologic Health Branch State Department of Health Services Post Office Box 942732 Sacramento, California 94234 Resident Inspector/San Onofre NPS c/o U.S. Nuclear Regulatory Commission Post Office Box 4329 San Clemente, California 92674

Mayor

City of San Clemente 100 Avenida Presidio San Clemente, California 92672



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

DOCKET NO. 50-361

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 126 License No. NPF-10

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee) dated August 1, 1995, as supplemented by letter dated October 18, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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- 2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-10 is hereby amended to read as follows:
 - (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 126, are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of the date of its issuance to be implemented within 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Mel B. Eich

Mel B. Fields, Project Manager Project Directorate IV-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: November 2, 1995

ATTACHMENT TO LICENSE AMENDMENT

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AMENDMENT NO. 126 TO FACILITY OPERATING LICENSE NO. NPF-10

DOCKET NO. 50-361

Replace the following page of the Appendix A Technical Specifications with the enclosed page. The revised page is identified by amendment number and contains veritical lines indicating the areas of change. The corresponding overleaf page is also provided to maintain document completeness.

REMOVE	INSERT
3/4 3-21	3/4 3-21

Table 3.3-3 (Continued)

TABLE NOTATION

- ACTION 13 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, within 1 hour initiate and maintain operation of the control room emergency air cleanup system in the emergency (except as required by ACTIONS 14, 15) mode of operation.
- ACTION 14 With the number of channels OPERABLE one less than the total number of channels, restore the inoperable channel to OPERABLE status within 7 days or within the next 6 hours initiate and maintain operation of the control room emergency air cleanup system in the isolation mode of operation. (See Note 1)
- ACTION 15 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, within 1 hour initiate and maintain operation of the control room emergency air cleanup system in the isolation mode of operation. (See Note 1)
- ACTION 16 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.9.12.
- ACTION 17 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, operation may continue provided that the purge valves are maintained closed.
- ACTION 17a With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.4.5.1. (Mode 1, 2, 3, 4 only)
- ACTION 17b With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, close each of the containment purge penetrations providing direct access from the containment atmosphere to the outside atmosphere.
- NOTE 1 During construction for DCP 2/3-6933.00SJ Actions 14 and 15 will not be in effect. Compensatory actions for the TGIS channels will be conducted in accordance with the October 18, 1995, Edison letter to the U.S. Nuclear Regulatory Commission.

SAN										
ONO		TABLE 3.3-4								
FRE-U		ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION TRIP VALUES								
JNIT 2	<u>Fun</u> 1.	CTIONAL UNIT SAFETY INJECTION (SIAS)	TRIP VALUE	ALLOWABLE VALUES						
		 a. Manual (Trip Buttons) b. Containment Pressure - High c. Pressurizer Pressure - Low d. Automatic Actuation Logic 	Not Applicable ≤ 3.4 psig ≥ 1740 psia (1) Not Applicable	Not Applicable ≤ 3.7 psig ≥ 1700 psia (1)						
3/4 3-22 AMENDMENT NO. 88	2. 3.	CONTAINMENT SPRAY (CSAS) a. Manual (Trip Buttons) b. Containment Pressure High-High c. Automatic Actuation Logic CONTAINMENT ISOLATION (CIAS) a. Manual CIAS (Trip Buttons) b. Manual SIAS (Trip Buttons) ⁽⁵⁾ c. Containment Pressure - High d. Automatic Actuation Logic MAIN STEAM ISOLATION (Manage	Not Applicable < 14.0 psig Not Applicable	Not Applicable Not Applicable < 15.0 psig Not Applicable						
			Not Applicable Not Applicable <3.4 psig Not Applicable	Not Applicable Not Applicable < 3.7 psig Not Applicable						
		a. Manual (Trip Buttons) b. Steam Generator Pressure - Low c. Automatic Actuation Logic RECIRCULATION (RAS)	Not Applicable <pre>> 741 psia (2) Not Applicable</pre>	Not Applicable ≥ 729 psia (2) Not Applicable						
		a. Refueling Water Storage Tank b. Automatic Actuation Logic	18.5% of tap span Not Applicable	19.27% <u>></u> tap span <u>></u> 17.73% Not Applicable						

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UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

DOCKET NO. 50-362

SAN ONOFRE NUCLEAR GENERATING STATION, UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 115 License No. NPF-15

1. The Nuclear Regulatory Commission (the Commission) has found that:

- A. The application for amendment by Southern California Edison Company, et al. (SCE or the licensee) dated August 1, 1995, as supplemented by letter dated October 18, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
- B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission:
- C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
- D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
- E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

- 2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-15 is hereby amended to read as follows:
 - (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 115, are hereby incorporated in the license. Southern California Edison Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of the date of its issuance to be implemented within 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Mel B. Fields

Mel B. Fields, Project Manager Project Directorate IV-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: November 2, 1995

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 115 TO FACILITY OPERATING LICENSE NO. NPF-15

DOCKET NO. 50-362

Replace the following page of the Appendix A Technical Specifications with the enclosed page. The revised page is identified by amendment number and contains veritical lines indicating the areas of change. The corresponding overleaf page is also provided to maintain document completeness.

REMOVE INSERT 3/4 3-21 3/4 3-21

Table 3.3-3 (Continued)

TABLE NOTATION

- ACTION 13 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, within 1 hour initiate and maintain operation of the control room emergency air cleanup system in the emergency (except as required by ACTIONS 14, 15) mode of operation.
- ACTION 14 With the number of channels OPERABLE one less than the total number of channels, restore the inoperable channel to OPERABLE status within 7 days or within the next 6 hours initiate and maintain operation of the control room emergency air cleanup system in the isolation mode of operation. (See Note 1)
- ACTION 15 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, within 1 hour initiate and maintain operation of the control room emergency air cleanup system in the isolation mode of operation. (See Note 1)
- ACTION 16 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.9.12.
- ACTION 17 With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, operation may continue provided that the purge valves are maintained closed.
- ACTION 17a With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.4.5.1. (MODE 1, 2, 3, 4 only)
- ACTION 17b With the number of channels OPERABLE less than required by the minimum channels OPERABLE requirement, close each of the containment purge penetrations providing direct access from the containment atmosphere to the outside atmosphere.
- NOTE 1 During construction for DCP 2/3-6933.00SJ Actions 14 and 15 will not be in effect. Compensatory actions for the TGIS channels will be conducted in accordance with the October 18, 1995, Edison letter to the U.S. Nuclear Regulatory Commission.

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TABLE 3.3-4

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION TRIP VALUES

FUNCTIONAL UNIT

TRIP VALUE

ALLOWABLE VALUES

SAFETY INJECTION (SIAS) Manual (Trip Buttons) a. Not Applicable Containment Pressure - High b. < 3.4 psigPressurizer Pressure - Low C. > 1740 psia (1) Automatic Actuation Logic d. Not Applicable CONTAINMENT SPRAY (CSAS) Manual (Trip Buttons) a. Not Applicable Containment Pressure -- High-High b. < 14.0 psig Automatic Actuation Logic C. Not Applicable CONTAINMENT ISOLATION (CIAS) Manual CIAS (Trip Buttons) a. Not Applicable Manual SIAS (Trip Buttons)(5) b. Not Applicable **Containment Pressure - High** c. < 3.4 psigAutomatic Actuation Logic d. Not Applicable MAIN STEAM ISOLATION (MSIS) Manual (Trip Buttons) a. Not Applicable Steam Generator Pressure - Low b. > 741 psia (2) Automatic Actuation Logic C. Not Applicable RECIRCULATION (RAS) Refueling Water Storage Tank a. 18.5% of tap span Automatic Actuation Logic b. Not Applicable

Not Applicable </

Not Applicable Not Applicable <3.7 psig Not Applicable

Not Applicable > 729 psia (2)
Not Applicable

19.27% \geq tap span \geq 17.73% Not Applicable

3/4 3-22

AMENDMENT NO. 78

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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 126 TO FACILITY OPERATING LICENSE NO. NPF-10

AND AMENDMENT NO. 115 TO FACILITY OPERATING LICENSE NO. NPF-15

SOUTHERN CALIFORNIA EDISON COMPANY

SAN DIEGO GAS AND ELECTRIC COMPANY

THE CITY OF RIVERSIDE, CALIFORNIA

THE CITY OF ANAHEIM, CALIFORNIA

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

DOCKET NOS. 50-361 AND 50-362

1.0 INTRODUCTION

By letter dated August 1, 1995, and as supplemented by letter dated October 18, 1995, Southern California Edison Company, et al. (SCE or the licensee) submitted a request for changes to the Technical Specifications (TS) for San Onofre Nuclear Generating Station, Unit Nos. 2 and 3. The propose changes would revise TS 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation," Table 3.3-3. Table 3.3-3 includes the requirements for the minimum number of toxic gas isolation system (TGIS) trains operable. This request is a one-time-only change to extend the allowed TGIS outage times during replacement of TGIS instrumentation.

The proposed changes would add a note to TS Table 3.3-3 for each unit. This note states that, on a one-time basis during the replacement of the existing TGIS instrumentation, compensatory actions would be taken in lieu of the standard actions required by TS Table 3.3-3.

The October 18, 1995, supplemental letter provided additional clarifying information and did not change the initial no significant hazards consideration determination which was published in the <u>Federal Register</u> on September 13, 1995 (60 FR 47625).

2.0 BACKGROUND

The General Design Criteria (GDC) as defined in Appendix A to 10 CFR Part 50 serve to establish the principal requirements needed for the design, fabrication, construction, testing, and performance of a facility's safety related structures, systems, and components that provide reasonable assurance that a facility can be operated safely. GDC 4, "Environmental and missile

9511150378 951102 PDR ADUCK 05000361 design bases," requires, in part, that those components important to safety be appropriately protected from events and conditions outside the nuclear plant. GDC 19, "Control room," requires that a control room be provided from which actions can be taken to operate the nuclear power unit safely under normal conditions and to maintain it in a safe condition under accident conditions.

The relevant acceptance criteria for the control room habitability are located in Regulatory Guide 1.78, "Assumptions for Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release," and Regulatory Guide 1.95, "Protection of Nuclear Power Plant Control Room Operators Against an Accidental Chlorine Release." Further guidance is provided by Chapter 6.4, "Control Room Habitability System," of the Standard Review Plan (NUREG-0800).

SONGS Units 2 and 3 have a shared control room, with a common control room emergency air cleanup system (CREACUS). The CREACUS contains two redundant emergency filtration trains, each equipped with an emergency ventilation supply unit and an air conditioning unit. Two independent TGIS channels (Channels A and B), located at the outside air intake for the normal air conditioning unit, protect the control room occupants from a toxic release at or in the vicinity of the plant. TGIS analyzers monitor for high concentrations of butane, propane, ammonia, and chlorine. When the technical specification (TS) limit for a toxic chemical release is reached, the toxic gas isolation system (TGIS) automatically isolates the control room and initiates CREACUS operation in the recirculation mode. Both TGIS channels are required by TS 3/4.3.2 to be operable in all modes of operation; Action 14 of TS Table 3.3-3 states that should one channel be inoperable it must be restored within 7 days or the CREACUS must be initiated and maintained in the isolation mode within the next 6 hours. If no TGIS channels are operable, Action 15 of TS Table 3.3-3 states that CREACUS must be initiated and maintained in the isolation mode within 1 hour.

The licensee states that the only TGIS ammonia and butane analyzers have been rendered obsolete due to advances in the field of analytical instrumentation. The increasing unavailability of replacement parts because of the manufacturer's decision to discontinue the manufacturing of the analyzers is another factor in the licensee's decision to replace the analyzers. The relative age of the TGIS is also a growing concern since the ammonia analyzers need more frequent maintenance and have experienced several spurious trips.

The proposed addition of Note 1 to TS Table 3.3-3 will, on a one-time basis for the duration of the TGIS instrumentation replacement interval, replace Actions 14 and 15 with the compensatory measures outlined in the licensee's October 18, 1995, letter to the NRC.

3.0 EVALUATION

The TGIS was installed in the SONGS control room because the location, frequency and size of toxic substances near or on the site were such that manual isolation of the control room could not be credited quickly enough to ensure the safety of control room personnel. In order to provide for an equivalent level of safety during the TGIS instrumentation replacement period, the licensee has, in its letter dated August 1, 1995, as supplemented by letter dated October 18, 1995, committed to the following:

- Replacement activities will be performed on one channel of TGIS at a time. After the first channel of instrumentation is replaced, both channels of TGIS will be operable for a 7-to-30-day period to assure proper operation of the new instrumentation before the second channel of instrumentation is replaced.
- 2. To improve reliability of TGIS operation, preventive maintenance will be performed on the operable channel of TGIS instrumentation before the other TGIS train is replaced.
- 3. The operable channel of TGIS may experience spurious actuations during periods of construction involving extensive cutting and welding work within the cabinet that contains both channels of TGIS. During these periods the control room will be isolated with CREACUS initiated and maintained in the isolation mode and the operable TGIS channel will be in bypass.
- 4. The control room is not designed to remain in an isolated mode for extended periods of time (toxic gas releases which the TGIS is designed to mitigate are expected to dissipate to acceptable levels in less than 24 hours). If the licensee cannot restore one train of TGIS after 24 hours of control room isolation, the operators will return control room ventilation to normal operation to allow the control room air quality to return to normal. If this situation should arise, the licensee has committed to have dedicated personnel stationed in locations where observation of potential significant toxic releases can be accomplished. These individuals will be in continuous communication with the control room to provide the operators with rapid notification of any accidents involving potential toxic releases. This will provide the operators with sufficient time to manually isolate the control room before toxic releases can intrude into the control room and provides a level of safety that is comparable to that experienced in normal plant operation with the TGIS available.

The staff has compared the compensatory measures outlined above to the design basis and current TS requirements for the TGIS, and concludes that the compensatory measures committed to by the licensee provide an equivalent level of protection to the control room operators. During all phases of the TGIS instrument replacement activities, sufficient measures will be available to protect control room personnel from being adversely affected by events involving toxic releases. For these reasons, the staff finds the licensee's proposed addition of Note 1 to TS Table 3.3-3, allowing a one-time exception to Actions 14 and 15, acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the California State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change requirements with respect to the installation or use of a facility component located in the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (60 FR 47625). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: E. A. Brown

Date: November 2, 1995