

SEP 12 1984

MEMORANDUM FOR: James R. Miller, Chief
 Operating Reactor Branch No. 3
 Division of Licensing

FROM: George W. Knighton, Chief
 Licensing Branch No. 3
 Division of Licensing

SUBJECT: REQUEST FOR PUBLICATION IN MONTHLY FR NOTICE - NOTICE OF
 CONSIDERATION OF ISSUANCE OF AMENDMENTS TO FACILITY
 OPERATING LICENSE AND PROPOSED NO SIGNIFICANT HAZARDS
 CONSIDERATION DETERMINATION AND OPPORTUNITY FOR A HEARING

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 Docket File 50-361/362
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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 request: April 6, 1984, April 27, 1984 and September 11, 1984
 (reference PCN-135)

Description of amendment request: Technical Specification 3/4.3.2 requires that
 the Engineered Safety Features Actuation System (ESFAS) instrumentation channels
 be operable, and defines a number of functional tests and response time tests
 that must be periodically conducted in order to assure operability. Table
 3.3-4 of this Technical Specification defines the ESFAS instrumentation trip
 values for the Toxic Gas Isolation System (TGIS). The TGIS is actuated by
 greater than allowable concentration of toxic gas (i.e., chlorine, ammonia,
 butane/propane, or carbon dioxide) in the normal control room air supply
 duct. Upon receipt of a TGIS signal, the control room heating, ventilation,

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and air conditioning (HVAC) system is automatically isolated. The FSAR analysis indicates that adequate protection for the control room operators will be provided if the toxic gas concentration in the control room during the first two (2) minutes after the detector responds is less than the protective action limit for toxic gas concentration. The proposed change would make the following revisions to Table 3.3-4:

- (1) The allowable values for chlorine concentration would be increased from less than or equal to 6.2 ppm to less than or equal to 15.0 ppm. With an allowable value for chlorine limited to less than or equal to 15.0 ppm, the high chlorine trip value would be increased from less than or equal to 6.0 ppm to less than or equal to 14.3 ppm.
- (2) The allowable values for ammonia concentration would be increased from less than or equal to 44.7 ppm to less than or equal to 100 ppm. With an allowable value for ammonia limited to less than or equal to 100 ppm, the high ammonia trip value would be increased from less than or equal to 42.4 ppm to less than or equal to 97 ppm.

- (3) The allowable values for butane/propane concentration would be increased from less than or equal to 89.3 ppm to less than or equal to 200 ppm. With an allowable value for butane/propane limited to less than or equal to 200 ppm, the high butane/propane trip value would be increased from less than or equal to 84.8 ppm to less than or equal to 193 ppm.
- (4) The allowable value for carbon dioxide concentration would be deleted (the present value is less than or equal to 4275.0 ppm). Therefore the high carbon dioxide trip value would also be deleted (the present value is less than or equal to 4061.3 ppm).

Basis for proposed no significant hazards consideration determination: The Commission has provided guidance concerning the application of the standards for determining whether a significant hazard consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (vi) relates to a change which may result in some increase in the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptance criteria with respect to the system or component specified in the Standard Review Plan (SRP). The proposed change is similar to this example in that the proposed

allowable toxic gas concentrations, while larger than those presently used, nevertheless meet the requirements of Section 6.4 of the Standard Review Plan by ensuring that during the first two (2) minutes after the detector responds, the control room will not exceed the protective action limit for toxic gas concentration.

Specifically, the license has recently revised the flow model in the previously used method for calculating toxic gas concentration in the control room. Analysis using the revised model has shown that the revised TGIS allowable values and trip setpoints will still provide the plant operators with the required two (2) minutes of warning time before the protective action limit for toxic gas concentration in the control room is exceeded.

In the case of item (4), above, the licensees' analysis shows that even with no control room isolation, the maximum control room concentration of carbon dioxide at any time is 11,000 ppm. Since the two (2) minute protective action limit for carbon dioxide is 50,000 ppm, this monitor can be deleted from the Technical Specifications and the plant will still meet the toxic gas criteria of the SRP. Therefore, based on the above considerations, the Commission proposes to determine that these changes do not involve a significant hazards consideration.

Local Public Document Room location: San Clemente Library, 242 Avenida Del Mar,
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NRC Branch Chief: George W. Knighton

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