Docket Nos.: 50-361 and 50-362

Mr. Kenneth P. Baskin Vice President Southern California Edison Company 2244 Walnut Grove Avenue Post Office Box 800 Rosemead, California 91770 Mr. James C. Holcombe Vice President - Power Supply San Diego Gas & Electric Company 101 Ash Street Post Office Box 1831 San Diego, California 92112

Gentlemen:

SUBJECT: ISSUANCE OF AMENDMENT NO. 57 TO FACILITY OPERATING LICENSE NPF-10 AND AMENDMENT NO. 46 TO FACILITY OPERATING LICENSE NPF-15 SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

The Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 57 to Facility Operating License No. NPF-10 and Amendment No. 46 to Facility Operating License No. NPF-15 for the San Onofre Nuclear Generating Station, Units 2 and 3, located in San Diego County, California. The amendments revise Technical Specification 3/4.3.3.8, "Radioactive Effluent Monitoring Instrumentation."

These amendments were requested by your letters of March 2, 1984, and April 2, 1984, and cover Proposed Change Number PCN-131.

A copy of the Safety Evaluation supporting the amendments is also enclosed.

Sincerely,

Harry Rood, Senior Project Manager PWR Project Directorate No. 7 Division of PWR Licensing-B

Enclosures:

- 1. Amendment No. 57 to NPF-10
- 2. Amendment No. 46 to NPF-15
- 3. Safety Evaluation
- cc: See next page



Mr. Kenneth P. Baskin Southern California Edison Company

cc:

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Resident Inspector, San Onofre NPS c/o U. S. Nuclear Regulatory Commission Post Office Box 4329 San Clemente, California 92672 Southern California Edison Company - 2 -

San Onofre 2/3

cc: California State Library Government Publications Section Library & Courts Building Sacramento, CA 95841 ATTN: Ms. Mary Schnell

Mayor, City of San Clemente San Clemente, CA 92672

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

California Department of Health ATTN: Chief, Environmental Radiation Control Unit Radiological Health Section 714 P Street, Room 498 Sacramento, CA 95814

Mr. Joseph O. Ward, Chief Radiological Health Branch State Department of Health Services 714 P Street, Building #8 Sacramento, California 95814

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

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 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 57 License No. NPF-10

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The applications for amendment to the license for San Onofre Nuclear Generating Station, Unit 2 (the facility) filed by the Southern California Edison Company on behalf of itself and San Diego Gas and Electric Company, The City of Riverside and the City of Anaheim, California (licensees) dated March 2 and April 2, 1984 comply with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations as set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the 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 set forth in 10 CFR Chapter I;
 - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public;
 - 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 amendment and Paragraph 2.C(2) of Facility Operating License No. NPF-10 is hereby amended to read as follows:
 - (2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 57, are hereby incorporated in the license. SCE shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

- 3. The changes in Technical Specifications are to become effective within 30 days of issuance of the amendment. In the period between issuance of the amendment and the effective date of the new Technical Specifications, the licensees shall adhere to the Technical Specifications existing at the time. The period of time during change over shall be minimized.
- 4. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

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Harry Rood, Senior Project Manager PWR Project Directorate No. 7 Division of PWR Licensing-B

Attachment: Changes to the Technical Specifications

Date of Issuance: January 20, 1987

ATTACHMENT TO LICENSE AMENDMENT NO. 57

FACILITY OPERATING LICENSE NO. NPF-10

DOCKET NO. 50-361

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Also to be replaced are the following overleaf pages to the amended pages.

Amendment Pages

Overleaf Pages

3/4 3-63 3/4 3-65 3/4 3-64

INSTRUMENTATION

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.8 The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3-12 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.11.1.1 are not exceeded. The alarm/trip setpoints of these channels shall be determined in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM).

APPLICABILITY: At all times.*

ACTION:

- a. With a radioactive liquid effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, immediately suspend the release of radioactive liquid effluents monitored by the affected channel or declare the channel inoperable.
- b. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-12. Exert best efforts to return the instrument to OPERABLE status within 30 days and, additionally, if the inoperable instrument(s) remain inoperable for greater than 30 days, explain in the next Semiannual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.
- c. The provisions of Specifications 3.0.3, 3.0.4, and 6.9.1.13b are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.8.1 Each radioactive liquid effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-8.

4.3.3.8.2 At least once per 4 hours, all pumps required to be providing dilution to meet the site radioactive effluent concentration limits of Specification 3.11.1.1 shall be determined to be operating and providing dilution to the discharge structure.

^{*}See Special Test Exception 3.10.5.

TABLE 3.3-12

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

| | | INSTRUMENT | MINIMUM CHANNELS OPERABLE | ACTION |
|----|-------------|---|---------------------------------|--------|
| 1. | GROS TER | S RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC MINATION OF RELEASE | | |
| | a. | Liquid Radwaste Effluent Line - 2/3 RT - 7813 | 1 | 28 |
| | b. | Steam Generator Blowdown (Neutralization Sump) Effluent Line - 2RT - 7817 | 1 | 29 |
| | c. | Turbine Building Sumps Effluent Line - 2RT - 7821 | 1 | 30 |
| | d. | Steam Generator (E088) Blowdown Bypass Effluent Line - 2RT6759 | 1 | 29 |
| | e. | Steam Generator (E089) Blowdown Bypass Effluent Line - 2RT6753 | 1 | 29 |
| 2. | FLOW | RATE MEASUREMENT DEVICES | | |
| | a. | Liquid Radwaste Effluent Line | 1 | 31 |
| | b. | Steam Generator Blowdown (Neutralization Sump) Effluent Line | 1 | 31 |
| | c. | Steam Generator (E088) Blowdown Bypass Effluent Line | 1 | 31 |
| | d. | Steam Generator (E089) Blowdown Bypass Effluent Line | 1 | 31 |
| | | | | |

TABLE 3.3-12 (Continued)

TABLE NOTATION

- ACTION 28 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases may continue provided that prior to initiating a release:
 - a. At least two independent samples are analyzed in accordance with Specification 4.11.1.1.3, and
 - At least two technically qualified members of the Facility Staff independently verify the release rate calculations and discharge line valving;

Otherwise, suspend release of radioactive effluents via this pathway.

- ACTION 29 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided grab samples are analyzed for gross radioactivity (beta or gamma) at a limit of detection of at least 10 microcuries/gram:
 - At least once per 8 hours when the specific activity of the secondary coolant is greater than 0.01 microcuries/ gram DOSE EQUIVALENT I-131;
 - b. At least once per 24 hours when the specific activity of the secondary coolant is less than or equal to 0.01 microcuries/gram DOSE EQUIVALENT I-131; or
 - c. Lock closed valve HV-3773 and divert flow to T-064 for processing as liquid radwaste.
- ACTION 30 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided that, at least once per 8 hours, grab samples are collected and analyzed for gross radioactivity (beta or gamma) at a limit of detection of at least 10 microcuries/ml or lock closed valve S22U19-MU077 or S22U19-MU078 and divert flow to the radwaste sump for processing as liquid radwaste.
- ACTION 31 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours during actual releases. Pump curves may be used to estimate flow.



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON. D. C. 20555

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 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 46 License No. NPF-15

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The applications for amendment to the license for San Onofre Nuclear Generating Station, Unit 3 (the facility) filed by the Southern California Edison Company on behalf of itself and San Diego Gas and Electric Company, The City of Riverside and the City of Anaheim, California (licensees) dated March 2 and April 2, 1984 comply with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations as set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the 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 set forth in 10 CFR Chapter I;
 - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public;
 - 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 amendment and Paragraph 2.C(2) of Facility Operating License No. NPF-15 is hereby amended to read as follows:
 - (2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 46, are hereby incorporated in the license. SCE shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

- 3. The changes in Technical Specifications are to become effective within 30 days of issuance of the amendment. In the period between issuance of the amendment and the effective date of the new Technical Specifications, the licensees shall adhere to the Technical Specifications existing at the time. The period of time during change over shall be minimized.
- 4. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

and

Harry Rood, Senior Project Manager PWR Project Directorate No. 7 Division of PWR Licensing-B

Attachment: Changes to the Technical Specifications

Date of Issuance: January 20, 1987

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ATTACHMENT TO LICENSE AMENDMENT NO. 46

FACILITY OPERATING LICENSE NO. NPF-15

DOCKET NO. 50-362

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Also to be replaced are the following overleaf pages to the amended pages.

| Amendment Page | <u>Overleaf Page</u> |
|----------------|----------------------|
| 3/4 3-64 | 3/4 3-63 |
| 3/4 3-66 | 3/4 3-65 |

| Zone | Instrument Location | Early Warning HEAT FLAME SMOKE | Actuation HEAT FLAME SMOKE |
|-------|---|-----------------------------------|-------------------------------|
| 78 | <u>Control Building Elev 9'</u> Corridor Rm 105 | 4 | |
| 79 | Control Building Elev 50' ESF Switchgear Rm 302A ESF Switchgear Rm 302B | 2 | |
| 80 | Radwaste Elev 37' & 50' Duct Shaft Rms | None | |
| 81 | Radwaste Elev 63'6" Duct Shaft Rms 527A,B | None | |
| 83 | Salt Water Cooling Tunnel | 6* | ĸ |
| 84 | <u>Safety Eqpmt Bldg Elev 8'</u> HVAC Rm 017 | 3 | |
| Techi | nical Support Center (TSC) | 5 1 | (Note 3) |

TABLE 3.3-11 (Continued)

*3 in UNIT 2, 3 in UNIT 3

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<u>Notes</u>

| 1. | 0n | completion | of | DCP | 3-403E |
|----|----|------------|----|-----|--------|
| 2. | 0n | completion | of | DCP | 3-122M |
| 3. | 0n | completion | of | DCP | 2-403E |

INSTRUMENTATION

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.8 The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3-12 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.11.1.1 are not exceeded. The alarm/trip setpoints of these channels shall be determined in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM).

APPLICABILITY: At all times.

ACTION:

- a. With a radioactive liquid effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, immediately suspend the release of radioactive liquid effluents monitored by the affected channel or declare the channel inoperable.
- b. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-12. Exert best efforts to return the instrument to OPERABLE status within 30 days and, additionally, if the inoperable instrument(s) remain inoperable for greater than 30 days, explain in the next Semiannual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.
- c. The provisions of Specifications 3.0.3, 3.0.4, and 6.9.1.13b are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.8.1 Each radioactive liquid effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-8.

4.3.3.8.2 At least once per 4 hours, all pumps required to be providing dilution to meet the site radioactive effluent concentration limits of Specification 3.11.1.1 shall be determined to be operating and providing dilution to the discharge structure.

TABLE 3.3-12

44 A.

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

| | | INSTRUMENT | MINIMUM CHANNELS <u>OPERABLE</u> | ACTION |
|----|---------------|---|--|--------|
| 1. | GROS: TERI | S RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC MINATION OF RELEASE | | |
| | a. | Liquid Radwaste Effluent Line - 2/3 RT - 7813 | 1 | 28 |
| | b. | Steam Generator Blowdown (Neutralization Sump) Effluent Line - 3RT - 7817 | 1 | 29 |
| | c. | Turbine Building Sumps Effluent Line - 3RT - 7821 | 1 | 30 |
| | d. | Steam Generator (E088) Blowdown Bypass Effluent Line - 3RT6759 | 1 | 29 |
| | e. | Steam Generator (E089) Blowdown Bypass Effluent Line - 3RT6753 | 1 | 29 |
| 2. | FLOW | RATE MEASUREMENT DEVICES | | |
| | a. | Liquid Radwaste Effluent Line | 1 | 31 |
| | b. | Steam Generator Blowdown (Neutralization Sump) Effluent Line | 1 | 31 |
| | c. | Steam Generator (E088) Blowdown Bypass Effluent Line | 1 | 31 |
| | d. | Steam Generator (E089) Blowdown Bypass Effluent Line | 1 | 31 |

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TABLE 3.3-12 (Continued)

TABLE NOTATION

- ACTION 28 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases may continue provided that prior to initiating a release:
 - a. At least two independent samples are analyzed in accordance with Specification 4.11.1.1.3, and
 - At least two technically qualified members of the Facility Staff independently verify the release rate calculations and discharge line valving;

Otherwise, suspend release of radioactive effluents via this pathway.

- ACTION 29 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided grab samples are analyzed for gross radioactivity (beta or gamma) at a limit of detection of at least 10 microcuries/gram:
 - a. At least once per 8 hours when the specific activity of the secondary coolant is greater than 0.01 microcuries/ gram DOSE EQUIVALENT I-131.
 - b. At least once per 24 hours when the specific activity of the secondary coolant is less than or equal to 0.01 microcuries/gram DOSE EQUIVALENT I-131; or
 - c. Lock closed valve HV-3773 and divert flow to T-064 for processing as liquid radwaste.
- ACTION 30 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided that, at least once per 8 hours, grab samples are collected and analyzed for gross radioactivity (beta or gamma) at a limit of detection of at least 10 microcuries/ml or lock closed valve S22U19-MU077 or S22U19-MU078 and divert flow to the radwaste sump for processing as liquid radwaste.
- ACTION 31 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours during actual releases. Pump curves may be used to estimate flow.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 57 TO FACILITY OPERATING LICENSE NO. NPF-10

AND AMENDMENT NO. 46 TO FACILITY OPERATING LICENSE NO. NPF-15

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL.

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 & 3

DOCKET NOS. 50-361 AND 50-382

1.0 INTRODUCTION

Southern California Edison Company (SCE), on behalf of itself and the other licensees, San Diego Gas and Electric Company, The City of Riverside, California, and The City of Anaheim, California, has submitted a number of applications for license amendments for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. The NRC staff's evaluation of one of these applications is described below.

2.0 DISCUSSION

8702090261 870120 PDR ADOCK 05000361 PDR By letters dated March 2 and April 2, 1984, SCE requested that changes be made to Technical Specification 3/4.3.3.8, "Radioactive Liquid Effluent Monitoring Instrumentation" (Proposed Change PCN-131). Technical Specification (TS) 3/4.3.3.8 defines operability requirements for instrumentation used to monitor releases of radioactive liquids, periodic testing required to verify operability and actions to be taken in the event that the minimum operability requirements cannot be met.

The proposed change would revise TS 3/4.3.3.8 to:

- 1. Allow the use of pumps other than the circulating water pumps to provide dilution of radioactive liquid effluents.
- 2. Allow liquid effluents from certain release paths to be diverted to other portions of the liquid radwaste system when the associated liquid effluent monitor is inoperable. This would be an alternative to the current technical specification, which requires the licensee to analyze grab samples if releases are to continue.
- 3. Delete the current limitations on the period for which compensatory measures can be taken when radioactive liquid effluent monitoring instrumentation is inoperable, to eliminate an inconsistency in the technical specifications.

The NRC staff has evaluated the proposed changes and has found that they are acceptable. A description of the staff review of PCN-131 is given below.

3.0 EVALUATION

A. Allow use of pumps other than the circulating water pumps to provide liquid effluent dilution.

TS 3/4.3.3.8 currently requires that at least one circulating water pump must be operating and providing dilution to the circulating water system discharge structure whenever dilution is required to meet site radioactive effluent concentration. Liquid effluent concentration limits are specified by TS 3.11.1.1, "Liquid Effluents - Concentration." In addition to the circulating water pumps, which provide cooling water for the condenser when the plant is operating, there are other pumps (e.g., the saltwater cooling pumps) which are also capable of providing dilution of liquid effluents. The proposed change replaces the specific reference to circulating water pumps in TS 4.3.3.8.2 with "all pumps required to be providing dilution in order to meet the site radioactive effluent concentration limits." This non-specific reference to all pumps will allow use of pumps other than the circulating water pumps (e.g., the saltwater cooling pumps) as long as the site effluent concentration limits specified by TS 3.11.1.1 are met.

The NRC staff has reviewed this part of Proposed Change PCN-131 and finds it acceptable, because even though it allows the use of pumps other than the circulating water pumps to provide liquid effluent dilution, the plant will still meet all applicable criteria (i.e., 10 CFR Part 20) which are specified in TS 3.11.1.1.

B. Diversion of effluents to the liquid radwaste system in lieu of grab sampling.

Action 29 of TS 3/4.3.3.8 specifies the actions to be taken if effluents are being released via the steam generator blowdown effluent release path or either of its bypass lines when the required radioactive liquid effluent monitors are inoperable. Action 30 provides the actions to be taken if effluents are being released via the turbine building sump effluent release path when the required radioactive liquid effluent monitors are inoperable. Both Actions 29 and 30 currently state that the release of radioactive effluents via a pathway with inoperable monitors may continue provided that grab samples are analyzed periodically for gross radioactivity.

The proposed change would revise Actions 29 and 30 of TS 3/4.3.3.8 to explicitly allow isolating the release pathway and diverting the radioactive effluent flow to the liquid radwaste treatment system for processing as liquid radwaste. This proposed change would explicitly allow the steam generator blowdown and turbine building sumps radioactive liquid effluents to be processed in the same way as liquid radwaste from other sources. The existing Actions 29 and 30 require grab samples if releases are continued. If releases are made

via the affected pathways if radioactive effluent flow is diverted to the liquid radwaste system, so in this case grab samples would not be required. Since this action could be taken within the bounds of the existing Actions 29 and 30, the proposed change merely formalizes this alternative in the technical specifications. On this basis the NRC staff finds this part of proposed change PCN-131 to be acceptable.

C. Deletion of Time Limits in Effluent Monitoring Action Statements.

The applicability of actions to be taken when radioactive liquid effluent monitoring instrumentation is inoperable is limited to a specified period (e.g., 30 days). If effluent release continues beyond this period, even while continuing to implement the compensatory measures specified by the action, because of the time limit, this action would be outside of the bounds of the TS and would therefore invoke Technical Specification 3.0.3. TS 3.0.3 would require that action be taken to initiate a plant shutdown. TS 3/4.3.3.8 has an exception to TS 3.0.3 in accordance with which, at the end of the existing action time limit, it could be interpreted that no additional action is required. The TS 3.0.3 exception conflicts with the time limits in the actions. The proposed change removes the time limits, thereby eliminating the existing conflict. The proposed change will continue to require reporting of effluent monitoring instrumentation inoperabilities of greater than 30 days duration and continued implementation of the specified compensatory measures.

The NRC staff has reviewed this change and finds it acceptable, in part, because it is consistent with the requirements of NUREG-0472, Rev. 3, "Standard Radiological Effluent Technical Specifications for Pressurized Water Reactors."

In summary, the staff has reviewed proposed change PCN-131 and finds it acceptable, because it is consistent with NUREG-0472, and will not remove or relax any existing requirements needed to protect public health and safety.

4.0 CONTACT WITH STATE OFFICIAL

The NRC staff has advised the Chief of the Radiological Health Branch, State Department of Health Services, State of California, of the proposed determination of no significant hazards consideration. No comments were received.

5.0 ENVIRONMENTAL CONSIDERATION

These amendments involve changes in the installation or use of facility components located within the restricted area. The staff has determined that the amendments involve no significant increase in the amounts of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupation radiation exposure. The Commission has previously issued proposed findings that the amendments involve no significant hazards consideration, and there has been no public comment on such findings. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR Sec. 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need to be prepared in connection with the issuance of these amendments.

6.0 CONCLUSION

Based upon our evaluation of the proposed changes to the San Onofre Units 2 and 3 Technical Specifications, we have concluded that: there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public. We, therefore, conclude that the proposed changes are acceptable, and are hereby incorporated into the San Onofre 2 and 3 technical specifications.

Principal Contributor: J. Lee

Dated: January 20, 1987