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February 9, 1982

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Director, Office of Nuclear Reactor Regulation
Attention: Mr. Frank Miraglia, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555



Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

Reference is made to my letter to you dated February 3, 1982 concerning the implementation program for radiation monitors for San Onofre Nuclear Generating Station, Units 2 and 3. Subsequently, NRC Region V personnel requested that a different approach be utilized to provide schedule relief requested to allow sufficient time for enhanced calibration of radiation monitors. The new approach will incorporate a condition to the SONGS 2 and 3 Operating License that identifies in an appendix, the Technical Specification relief requested for radiation monitors.

Pursuant to the Region V suggestion, a meeting was held on February 8, 1982 at the Region V offices to reach agreement on the new approach. In accordance with agreements reached in that meeting, enclosed for your use are seven (7) copies (NRC Mail Code B028) of the following material:

Enclosure 1: Tabular presentation summarizing the Technical Specification Relief requested.

Enclosure 2: Specific Technical Specifications, corrected to reflect the change in approach for requesting schedule relief.

Enclosure 1 is considered suitable for appending to the SONGS 2 and 3 Operating License and referencing in a license condition that states: "Radiation Monitors shall be provided consistent with Technical Specification (Appendix A) requirements, except as noted in Appendix _____".

If you have any questions concerning these matters, please call me.

Very truly yours,

RP Baskin
for K. P. Baskin

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Enclosures

cc: F. J. Wenslawski - Region V

ENCLOSURE 1

Technical Specification Relief

A. Radiation Monitors

Monitor	Technical Specification Relief
<p>Control Room Airborne Monitors RT-7824/7825</p> <p>Containment Purge Area Monitors RT-7856/7857</p> <p>Containment Area Radiation-High Range RE-7820-1/7820-2</p>	<p>1) Calibrations performed during the startup program in accordance with FSAR Section 11.5.2.1.5.2 are acceptable in place of the CHANNEL CALIBRATION requirements of the applicable Technical Specification section prior to initial power increase above 5% Rated Thermal Power.</p>
<p>Radwaste Discharge Line Monitor RT-7813</p> <p>Blowdown Neutralization Sump Monitor RT-7817</p> <p>Turbine Building Sump Monitor RT-7821</p>	<p>1) Calibrations performed during the startup program in accordance with FSAR section 11.5.2.1.5.2 are acceptable in place of the CHANNEL CALIBRATION requirements of the applicable Technical Specification section prior to initial power increase above 5% Rated Thermal Power.</p> <p>2) Testing performed in accordance with FSAR Section 14.2.12 is acceptable in place of the initial CHANNEL FUNCTIONAL TEST requirements of the applicable Technical Specifications. Subsequent CHANNEL FUNCTIONAL TESTS are not required until 30 days after Initial Criticality.</p>
<p>Steam Jet Air Ejector Monitor RT-7818 A&B</p>	<p>1) Monitoring of the condenser evacuation path is not required until Initial Criticality.</p>
<p>Plant Vent Stack Airborne Monitor RT-7808</p>	<p>1) Calibrations performed during the startup program in accordance with FSAR Section 11.5.2.1.5.2 are acceptable in place of the CHANNEL CALIBRATION requirements of the applicable Technical Specification section prior to initial power increase above 5% Rated Thermal Power.</p> <p>2) Prior to 5% Rated Thermal Power operation in Action Statement 19 (Table 3.3-6) shall be allowed for up to 14 days for the purpose of performing the "initial CHANNEL CALIBRATION".</p>
<p>Containment Airborne Monitors RT-7804/7807</p>	<p>1) Calibrations performed during the startup program in accordance with FSAR Section 11.5.2.1.5.2 are acceptable in place of the CHANNEL CALIBRATION requirements of the applicable Technical Specification section prior to initial power increase above 5%</p>

Monitor	Technical Specification Relief
	2) Either of these monitors and its associated particulate and iodine samplers is acceptable for containment purge effluent monitoring until Initial Criticality.
Main Steam Line Area Monitor RT-7874A1, RT-7874B1 RT-7875A1, RT-7875B1 Condenser Evacuation System Radiation Monitor - Wide Range RT-7870-1 Purge/Vent Stack Radiation Monitor - Wide Range 2RT-7865-1, 3RT-7865-1	 To be operational prior to initial power increase above 5% Rated Thermal Power.
Waste Gas Header Monitor 2RT 7814	Plant Vent Stack Monitor RT 7808 performs the same functions as 2RT 7814 (monitors release and terminates on alarm). RT 7808 will be used in place of 2RT 7814 when 2RT 7814 is not operable.
<u>Sampling</u> Condenser Evacuation System Iodine Sampler Particulate Sampler Flow Rate Monitor Plant Vent Stack Flow Rate Monitor Containment Purge Flow Rate Monitor	 To be operational prior to initial power increase above 5% Rated Thermal Power.

A Quality Assurance Program for effluent and environmental monitoring (Technical Specification 6.8.1.i) using the guidance of Regulatory Guide 4.15, Rev. 1, February 1979, shall be implemented prior to July 1, 1982 or initial power increase above 5% Rated Thermal Power, whichever occurs first.

Continuous proportional sampling (Technical Specification Table 4.11-1 TABLE NOTATION "C") provisions shall be operational prior to 1-1-83. In the interim, administrative controls shall provide for composite sampling of continuous releases per Technical Specification Table 4.11-1 TABLE NOTATION "b".

B. Additional Technical Specification Changes

Tech. Spec.Technical Specification Relief

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| 1) 3/4 12.2 | Requirements of these specifications shall not be applicable prior to initial power increase above 5% Rated Thermal Power in order to be consistent with the phased implementation of Regulatory Guide 4.15, Rev. 1, February 1979. |
| 2) 3/4 12.3 | |
| 3) 6.8.4.b | |
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| 4) 6.8.4.d | Requirements of this specification shall not be applicable prior to initial power increase above 5% Rated Thermal Power in order to be consistent with the operability schedule for the Post Accident Sampling System. |
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ENCLOSURE 2

Technical Specification Changes