REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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FACIL:50-361 San Onofre Nuclear Station, Unit 2, Southern Californ 05000361
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KNIGHTON,G.W. Licensing Branch 3

SUBJECT: Application for amend to License NPF-10,revising Tech Specs re radioactive gaseous effluent monitoring instrumentation to permit replacement of reactor coolant pump seals & maintain personnel exposure ALARA,Change description encl.

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K. P. BASKIN
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TELEPHONE
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June 24, 1983

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

Gentlemen:

Subject: Docket No. 50-361
San Onofre Nuclear Generating Station
Unit 2

Enclosed for your review and approval is a copy of a proposed change to Unit 2 Technical Specification 3.3.3.9 Table 3.3-13 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION. Southern California Edison Company (SCE) is currently in an outage to replace Reactor Coolant Pump (RCP) seals on Unit 2. Seal replacement requires venting of the Reactor Coolant System (RCS) through an eductor system to the containment atmosphere. This results in radioactive contamination of the containment atmosphere to levels where it is not possible to proceed with replacement of the RCP seals. In order to proceed with RCP seal replacement and maintain personnel exposure as low as reasonably achieveable, it is necessary to route the eductor system directly to the purge outlet. Purge effluent activity will be below allowable limits.

Currently containment airborne radiation monitor 2RT-7804-1 is used as the containment purge monitor. It samples from the containment atmosphere which under normal circumstances is representative of purge efflent due to mixing. Routing of the eductor system directly to the purge outlet without contact with the containment atmosphere will bypass 2RT-7804-1 and render it inoperable from the purge effluent monitoring standpoint. This will invoke ACTION 38 of the referenced Technical Specification which requires closure of the purge valves. The proposed change will allow plant vent stack monitor 2RT-7865-1, which can be aligned to directly monitor the purge stack, to be used in lieu of 2RT-7804-1 as the purge effluent monitor. This will allow containment activity to be maintained at a level where RCP seal replacement can proceed. Additionally, it will prevent future recurrence of similar situations until the first refueling outage when a dedicated purge effluent monitor will be installed.

While SCE is presently pursuing an engineering solution to this problem, the potential for success of this solution is uncertain. SCE therefore believes that approval of the proposed change will be required to facilitate completion of seal replacement and return to power. SCE considers that the situation described above constitutes exigent circumstances and requests that the proposed change be expeditiously reviewed and approved in a manner corresponding to this determination. A formal request for an amendment

Board 1/1 w/check $4,000

to Operating License NPF-10 will be submitted during the week of July 11, 1983. In accordance with 10 CFR 170.22 this change has been determined to constitute a Class III amendment. A check for $4,000.00 corresponding to this determination is enclosed.

If you have any questions concerning the enclosed information, please call me.

Very truly yours,

W P Baskin

cc: Mr. Harry Rood, NRC (to be opened by addressee only)
Mr. Joseph O. Ward, California State Department of Health

DESCRIPTION OF PROPOSED CHANGE NPF-10-87 AND SAFETY ANALYSIS

This is a request to revise Technical Specification 3.3.3.9, Table 3.3-13 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION.

Existing Specification

Page 3/4 3-70 (Amendment 16, May 16, 1983)

ACTION 38 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, immediately suspend PURGING of radioactive effluents via this pathway.

Proposed Specification

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ACTION 38 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, immediately suspend PURGING of radioactive effluents via this pathway. (See Note 1.)

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NOTE 1

Containment purging using Plant Vent Stack Monitor 2RT-7865-1 in lieu of 2RT-7804-1 may continue prior to the end of the first refueling outage provided that:

(1) Plant Vent Stack Monitor 2-RT-7865-1 is aligned to the purge stack for the duration of the purge.

(2) Plant Vent Stack Monitors 2/3-RT-7808 is operable.

(3) In the event of a high activity alarm from 2RT-7865-1 during the purge, an operator will immediately suspend containment purge.

(4) When purging is complete, 2-RT-7865-1 is returned to its normal alignment.

Description

Currently containment airborne radiation monitor 2RT-7804-1 serves as containment purge effluent monitor. It does not directly monitor containment purge effluent but monitors the containment atmosphere which is representative of the purge effluent due to mixing. SCE, is currently in an outage to replace reactor coolant pump seals. This requires venting of the reactor coolant system through an eductor system to containment atmosphere thus contaminating it. To maintain containment activity at a level where work on the RCP seals can proceed, it is necessary to route the eductor directly to

the purge outlet. This will bypass containment airborne radiation monitor 2RT-7804-1 rendering it inoperable from the purge effluent monitoring standpoint. This invokes ACTION 38 which requires isolation of containment purge. It is therefore impossible to proceed with work on the RCP seals within the bounds of the current Technical Specifications. The proposed change alleviates this problem, by allowing the use of plant vent stack monitor 2RT-7865-1 (which can be aligned to the purge stack) to monitor purge effluent in lieu of 2RT-7804-1.

Although, Vent Stack Monitor 2RT-7865-1 is not equipped to automatically terminate purging, the proposed change compensates for this by requiring an operator to terminate purge on a high activity alarm on 2RT-7865-1. Additionally, the proposed change contains operability and alignment requirements for the other plant vent stack monitors to ensure that the plant vent stack effluents are monitored.

Safety Analysis

The proposed change discussed above shall be deemed to involve a significant hazards consideration if there is a positive finding in any of the following areas.

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No

   The containment purge system and associated effluent monitoring is not involved in the initiation of any previously evaluated accident. The proposed change affects only this system therefore does not increase the probability of any previously evaluated accident. The proposed change has an insignificant effect on the consequences of any previously evaluated accident because containment airborne radiation monitor 2RT-7804-1 is only one of several diverse means (e.g. SIAS, CIAS, containment area monitors) which result in purge isolation in the event of a previously evaluated accident.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated.

   Response: No

   The proposed change affects only the way in which containment purge effluents are monitored. The proposed change contains provisions to ensure that the method of purge effluent monitoring and conpensatory measures are essentially equivalent to the current provisions. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety.

   Response: No

   As stated above, the proposed change affects only the way in which containment purge effluents are monitored and contains provisions which ensure that the proposed method and compensatory measures are essentially equivalent to the current method. Therefore, no margins of safety are significantly reduced.

Safety and Significant Hazards Determination

Based on the Safety Evaluation, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; and (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

PWSmith:8514