## LIMITING CONDITION FOR OPERATION

3.6.1.7 Containment purge supply and exhaust isolation valves shall be OPERABLE and:

a. Each 42-inch containment purge supply and exhaust isolation valve shall be sealed closed.

b. Each 8-inch containment purge supply and exhaust isolation valve may be open for less than or equal to 1000 hours per 365 days.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

a. With the 42-inch containment purge supply and/or exhaust isolation valve(s) open or not sealed closed, or with the 8-inch purge supply and/or exhaust isolation valve(s) open for more than 1000 hours per 365 days, close and/or seal closed the open valve(s) within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. With a 42-inch or 8-inch containment purge supply and/or exhaust isolation valve having a measured leakage rate exceeding the limits of Surveillance Requirement 4.6.1.7.3, restore the inoperable valve(s) to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

## SURVEILLANCE REQUIREMENTS

4.6.1.7.1 The 42-inch containment purge supply and exhaust isolation valves shall be verified sealed closed at least once per 31 days.

4.6.1.7.2 The cumulative time that the 8-inch purge supply and exhaust isolation valves are open during the past 365 days shall be determined at least once per 7 days.

4.6.1.7.3 At least once per 3 months each 42 inch and each 8 inch purge supply and exhaust isolation valve with resilient material seals shall be demonstrated OPERABLE by verifying that the measured leakage rate is less than or equal to 0.05 $L_a$ when pressurized to $P_a$.

ATTACHMENT B

LIMITING CONDITION FOR OPERATION

3.6.1.7 Containment purge supply and exhaust isolation valves shall be OPERABLE and:

a. Each 42-inch containment purge supply and exhaust isolation valve shall be sealed closed.

b. Each 8-inch containment purge supply and exhaust isolation valve may be open for less than or equal to 3000 hours per 365 days.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

a. With the 42-inch containment purge supply and/or exhaust isolation valve(s) open or not sealed closed, or with the 8-inch purge supply and/or exhaust isolation valve(s) open for more than 3000 hours per 365 days, close and/or seal closed the open valve(s) within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. With a 42-inch or 8-inch containment purge supply and/or exhaust isolation valve having a measured leakage rate exceeding the limits of Surveillance Requirement 4.6.1.7.3, restore the inoperable valve(s) to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.7.1 The 42-inch containment purge supply and exhaust isolation valves shall be verified sealed closed at least once per 31 days.

4.6.1.7.2 The cumulative time that the 8-inch purge supply and exhaust isolation valves are open during the past 365 days shall be determined at least once per 7 days.

4.6.1.7.3 At least once per 3 months each 42 inch and each 8 inch purge supply and exhaust isolation valve with resilient material seals shall be demonstrated OPERABLE by verifying that the measured leakage rate is less than or equal to 0.05 $L_a$ when pressurized to $P_a$.

ATTACHMENT C

# 6 ENGINEERED SAFETY FEATURES

## 6.2 Containment Systems

### 6.2.4 Containment Isolation System

#### 6.2.4.5 Containment Purge System

In the SER we noted that there are two purge systems in San Onofre 2 and 3; the large-volume purge system with 42-inch lines and the mini-purge system with 8-inch lines. The mini-purge system was incorporated into the San Onofre 2 and 3 design to preclude the need for using the large-volume purge system during operating modes 1, 2, 3 and 4 (Power Operation, Startup, Hot Standby, and Hot Shutdown, respectively). Technical Specification 16.3/4 6.5 prohibits purging through the large-volume purge system during operating modes 1, 2, 3 and 4.

The mini-purge supply and exhaust valves satisfy the operability criteria of Branch Technical Position (BTP) CSB 6-4; therefore, these valves can be relied on to close following a LOCA. Also, the closure time of the mini-purge system isolation valves satisfies the guidelines of BTP CSB 6-4. Further evaluation of the operability and closure time of the mini-purge valves is contained in Subsection II.E.4.2 of Section 22 of Supplement No. 1 to the Safety Evaluation Report.

After SER Supplement No. 1 was issued, the applicants submitted a request for a change in the Technical Specifications to increase the time limitation on purging and venting using the mini-purge system, from 90 hours to continuous. The applicants identified the need to maintain activity levels within the containment atmosphere sufficiently low to permit personnel access to system components inside containment for inspection and maintenance. Although the applicants' rationale for exceeding 90 hours is reasonable, authorization for continuous use of the mini-purge system is not warranted without further justification based on plant operating experience. We have discussed this matter with the applicants, and the applicants have agreed to limit mini-purge system operation to 1000 hours per year, per reactor unit, during the normal plant operating modes of startup, power operation, hot standby, and hot shutdown. In the cold shutdown and refueling modes, all purging and venting lines may be used simultaneously and without time limitation. We will include these limitations in the Technical Specifications.

Based on our review, we conclude that the San Onofre 2 and 3 containment isolation system design conforms to General Design Criteria 54, 55, 56 and 57, and that the provisions of Standard Review Plan 6.2.4 have been satisfied. We consider this item to be resolved.