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 50-362 San Onofre Nuclear Station, Unit 3, Southern Californ 05000362
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SUBJECT: Application to amend Licenses NPF-10 & NPF-15, revising Tech.
 Spec 3/4.3.3.8 re frequency of grab sampling of turbine bldg
 sump effluent line at specified secondary coolant activity
 levels. Fee paid.

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Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Director
PWR Project Directorate No. 7
Division of PWR Licensing - B
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

Enclosed for your review and approval is a proposed change to the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 Technical Specifications. The proposed change, NPF-10/15-223 (PCN 223), revises Technical Specifications 3/4.3.3.8, "Radioactive Liquid Effluent Monitoring Instrumentation," to redefine the Action Statement in Table 3.3-12.

The proposed change would delete Action 30 and apply Action 29 to the turbine building sumps effluent line monitor. It would further revise Action 29 to specify that grab samples must be analyzed within 24 hours of collection, to allow releases to continue provided that grab samples be collected at least once per 12 hours when the specific activity of the secondary coolant is greater than .01 microcuries/gram or at least once per 24 hours when the specific activity of the secondary coolant is less than or equal to .01 microcuries/gram.

The Southern California Edison Company requests timely review and approval of the proposed change. In accordance with 10 CFR 170.12, enclosed is the required amendment application fee of \$150.00. A formal request for this change will be included in our next formal amendment application.

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

Very truly yours,

M. O. Medford
D. J. Kilmer

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PDR ADOCK 05000361
PDR

Enclosures

cc: Harry Rood, NRC Project Manager
F. R. Huey, USNRC Senior Resident Inspector, Units 1, 2 and 3

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DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-10/15-223, REVISION 1

This is a request to revise Technical Specification 3/4.3.3.3.8, "Radioactive Liquid Effluent Monitoring Instrumentation."

Existing Specifications

Unit 2: See Attachment A
Unit 3: See Attachment B

Proposed Specifications

Unit 2: See Attachment C
Unit 3: See Attachment D

Description

The proposed change would revise Table 3.3-12 of Technical Specification 3/4.3.3.3.8, "Radioactive Liquid Effluent Monitoring (RLEM) Instrumentation." Technical Specification 3/4.3.3.3.8 requires that the RLEM instrumentation channels be operable; and defines a number of functional tests and calibration tests that must be periodically conducted in order to assure such operability. Table 3.3-12 defines the minimum channels operable and actions to be taken to verify operability of each type of RLEM instrumentation. Specifically, Table 3.3-12 requires that the turbine building sumps effluent line monitor (RT-7821) be operable. In the event that it is inoperable, Action 30 specifies that effluent discharges may continue provided the grab samples are periodically taken and analyzed. The proposed change would delete Action 30 and apply Action 29 to the turbine building sumps effluent line monitor. Currently, Action 29 allows releases to continue provided that grab samples be collected and analyzed at least once per 8 hours when the specific activity of the secondary coolant is greater than .01 microcuries/gram or at least once per 24 hours when the specific activity of the secondary coolant is less than or equal to .01 microcuries/gram. The proposed change revises Action 29 to specify that grab samples must be analyzed within 24 hours of collection, to allow releases to continue provided that grab samples be collected at least once per 12 hours when the specific activity of the secondary coolant is greater than .01 microcuries/gram or at least once per 24 hours when the specific activity of the secondary coolant is less than or equal to .01 microcuries/gram. This revision to Action 29 will also revise the sampling frequency of (1) steam generator blowdown effluent line (RT-7817) and (2) steam generator blowdown bypass effluent lines (RT-6759 and RT-6753) when these monitors are inoperable.

Safety Analysis

The proposed change described above shall be deemed to involve significant hazards considerations 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 any accident previously evaluated?

Response: No

No assumptions are made regarding liquid effluent monitor operability or compensatory actions in any previously analyzed accident. Therefore, the proposed change has no significant impact on the probability or consequences of an 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 does not alter the configuration of the facility; therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident 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

All effluent monitors affected by the proposed change do not provide radiation level indication and alarm annunciation to enhance safety measures. Instead, they provide only a means for collection and laboratory analysis of required routine samples. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards 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 either may result in some increase to 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). Example (i) relates to a purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.

In this case, the pertinent acceptance criteria are found in SRP Section 11.5, "Process and Effluent Radiological Monitoring Instrumentation and Sampling Systems." SRP Section 11.5 requires that for all of the samples, a periodic analysis frequency for the collected samples should be specified in the Technical Specifications, NUREG 0472 "Standard Radiological and Effluent Treatment Technical Specifications for Pressurized Water Reactors (SRETS)" providing acceptable models. The proposed change deletes Action 30 and applies Action 29 to the Turbine Building Sumps Effluent Line monitor instead. It also redefines the sampling frequency in Action 29 from an eight (8) hour interval to a twelve (12) hour interval. Since the proposed change to Action 29 specifies a periodic analysis frequency for the collected samples in accordance with SRP Section 11.5 and NUREG 0472 requirements, sampling of effluent releases in (1) Steam Generator Blowdown Effluent Line (RT-1817) and (2) Steam Generator Blowdown Bypass Effluent Lines (RT-6759 and RT-6753) remains unaffected. More important, the sampling requirements are compensatory in nature and are not incorporated in any postulated accident analysis. There is no increase in the probability or consequences of a previously analysed accident. All effluent monitors affected by Action 29 do not provide radiation level indication and alarm annunciation other than a means for collection and laboratory analysis of required routine samples. No safety margin reduction will result in the relaxation of sampling frequencies. Therefore, the deletion of Action 30 and replacement with Action 29 still meets the acceptance criteria of SRP Section 11.5 and it is similar to Example (vi).

Additionally, the proposed change would revise Action 29 that grab samples be analyzed within the following 24 hours. This change is consistent with other section of NUREG 0427. In fact, it makes Action 29 in conformity with other effluent monitoring action statements such as "Condenser Evacuation System and Plant Vent Stack Noble Gas" - Action 37 in Technical Specification which specify both the grab sample frequency and the period during which analysis of samples must be completed. Because this change achieves consistency within the TS, this proposed change is similar to Example (1) of 48 FR 14870.

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 Environmental Statement.

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