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AUTH.NAME AUTHOR AFFILIATION
MEDFORD,M.O. Southern California Edison Co.
RECIP.NAME RECIPIENT AFFILIATION
MIRAGLIA,F. Licensing Branch 3

SUBJECT: Forwards changes to Tech Spec pages providing schedule relief to allow sufficient time for enhanced calibr of radiation monitors,per agreements reached at 820128 meeting in Bethesda,MD.Matrix & justification of relief encl.

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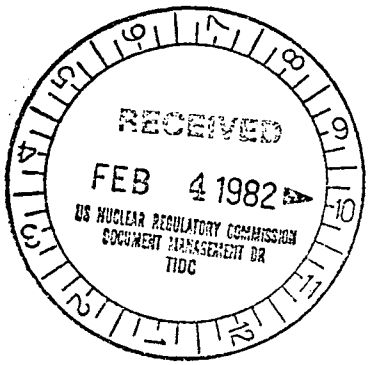
Southern California Edison Company

P. O. BOX 800
2244 WALNUT GROVE AVENUE
ROSEMEAD, CALIFORNIA 91770

K. P. BASKIN
MANAGER OF NUCLEAR ENGINEERING, SAFETY, AND LICENSING

TELEPHONE
(213) 572-1401

February 3, 1982




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

On January 28, 1982, a meeting was held at the NRC offices in Bethesda, Maryland. The purpose of the meeting was to discuss the implementation program for radiation monitors for San Onofre Nuclear Generating Station, Units 2 and 3.

The implementation program has two main objectives. The first is to provide radiation monitors for which the calibration is consistent with the latest state of the art criteria on the most expeditious schedule possible. The second objective is to ensure consistency between the schedule for bringing the radiation monitors into full compliance with the technical specifications and the stage in the initial plant startup at which they are functionally required. To achieve these objectives we have developed a phased approach.

In accordance with agreements reached in the meeting, enclosed for your use are seven (7) copies (NRC Mail Code B028) of the following material:

Enclosure 1: Specific Technical Specification pages changed to provide schedule relief requested to allow sufficient time for enhanced calibration of radiation monitors.

Enclosure 2: Tabular presentation summarizing for each radiation monitor, the schedule relief requested, the reason the schedule relief is required and justification for the schedule relief.

Enclosure 3: Justification for schedule relief on installation of proportional samplers.

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Enclosure 4: Discussion of present containment purge sampling provisions.

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

Very truly yours,

M. O. Medford for KPB

Enclosures

cc: F. J. Wenslawski-Region V

ENCLOSURE 2

| MONITOR | STATUS | SUMMARY OF SCHEDULE RELIEF REQUESTED | REASON SCHEDULE RELIEF IS REQUIRED | JUSTIFICATION FOR SCHEDULE RELIEF |
|---|---|---|---|---|
| I. a) Control Room Airborne monitor RF-7824/7825<br>b) Containment Airborne monitor RE-7804/7807<br>c) Containment Purge Area Monitor RE-7856/7857<br>d) Plant Vent Stack Airborne Monitor RE-7808 | Presently at least one channel of each monitor has been calibrated (Per FSAR 11.5.2.1.5.2) and has completed preoperational testing per FSAR chapter 14 (Note Technical Specifications tables 3.3-6 and 3.3-12 require only one channel of each of these monitors (a-d) to be operable) | Accept calibrations performed during the startup program in compliance with FSAR section 11.5.2.1.5.2 in place of the CHANNEL CALIBRATION requirements of the applicable tech. spec. section prior to initial power increase above 5% Rated Thermal Power. | Schedule relief is required in order to provide sufficient time for enhanced calibration of these monitors to be performed in a timely manner consistant with the plant evolutions during initial startup. | The combination of vendor and field calibrations (per FSAR 11.5.2.1.5.2) are the design basis of the plant. These calibrations provide adequate confidence that the monitors are properly calibrated given the low probability for release prior to exceeding 5% of Rated Thermal Power. Periodic surveillances (CHANNEL FUNCTIONAL TESTS, CHANNEL CHECKS, AND SOURCE CHECKS) performed in accordance with approved Station procedures provide additional confidence that these monitors will perform as required in the unlikely event of an unplanned release. |
| e) Hi-Range in Containment Monitor RE-7820-1/ 7820-2 | | As above. Note: Operability is not required until Mode 4 per tech. spec. table 3.3-6. | | |
| II. a) Radwaste Discharge Line Monitor RE-7813<br>b) Blowdown Neutralization Sump Monitor RE-7817<br>c) Turbine Building Sump Monitor RE-7821 | Presently each monitor has been chalibrated (per FSAR 11.5.2.1.5.2) and has been preoperatinally tested per FSAR chapter 14 | 1. Accept calibrations performed during the startup program in compliance with FSAR section 11.5.2.1.5.2 and functional testing performed in accordance with FSAR section 14.2.12.22 in place of the CHANNEL CALIBRATION and CHANNEL FUNCTIONAL test requirements of the applicable tables until power increase above 5% Rated Thermal Power<br>2. Defer repetition of subsequent CHANNEL FUNCTIONAL TEST until 30 days after initial criticality. | Schedule relief is required to allow available resources to be concentrated on performing the upgrade program on the highest priority monitors, thereby completing the enhanced calibrations at the earliest date achievable | The combination of vendor and field calibrations (per FSAR 11.5.2.1.5.2) and preoperational test results (per FSAR 14.2. 12.22) provides adequate confidence that the monitors are properly calibrated and operable. Prior to Initial Criticality no fission product inventory exists in the plant and therefore no possibility of release through these paths exists. Between Initial Criticality and 5% Rated Thermal Power the accumulated radwaste volume is very small and the probability for an uplanned release is extremely low. |
| d) Steam Jet Air Ejector Monitor RE-7818 A&B | Not Presently operable | Not required until Initial Criticality | | Prior to Initial Criticality no possibility of release via the SJAE exists |

ENCLOSURE 3

Justification for Schedule Relief on Installation of Proportional Samplers

The following liquid continuous release paths will have proportional samplers installed by January 1, 1983. Operation without proportional samplers is acceptable during the interim period for the reasons provided.

1) Steam Generator Blowdown - FSAR figures 10.1-1, sheet 1 and 10.4-2, sheet 1 provide the P&ID's for the steam and power conversion system as well as the blowdown processing system. Normally, fluid processed by the steam generator blowdown system is returned to the condensor hotwell. In the event of high conductivity alarm in this line, the fluid is diverted to the outfall header via the pathway monitored by the neutralization sump discharge monitor (RE7817). Upon receipt of a conductivity alarm, the blowdown system effluent will be sampled as necessary to obtain an equivalent proportional sample such that the requirements in Technical Specification Table 4.11-1 are met.

2) Turbine Building Sump - FSAR figures 9.3-2, sheet 2, 9.3-3 and 9.3-4, sheet 1 provide the P&ID's for the turbine building and related sumps. The turbine building sump collects drainage from the auxiliary building sump, intake area and all normal equipment and floor drainage from the turbine plant area. The turbine plant area sump normally discharges to the oily waste sump; however, upon a high radiation signal on monitor RE7821, the discharge is automatically diverted to the radwaste area sump. The probability of radioactivity in the turbine plant area sump is low. The discharge from the oily waste sump will be manually sampled prior to and during a discharge to the outfall.

3) Miscellaneous Wastes Evaporator Condensate - FSAR figures 11.2-1, sheet 2 and 11.2-3, sheet 2 provide the P&ID's for this potential release path. The discharge from the miscellaneous waste evaporator is normally directed to the evaporator condensate monitor tanks. These tanks are provided with an installed by-pass line which could permit the evaporator condensate to be discharged without being sampled as a batch release.

   The by-pass line valve 1415-2 1/2"-200 is normally locked closed. Monthly surveillance will ensure that this valve remains locked closed.

4) Salt Water Discharge from Component Cooling Heat Exchanger - FSAR section 9.2.1 and 9.2.2 describe the saltwater cooling and component cooling water systems. The component cooling water system of each unit is designed to remove heat from the various auxiliary systems containing radioactive or potentially radioactive fluids. It provides a radioactivity monitored (by radiation monitor RT7819 and grab sampling) intermediate barrier between the reactor auxiliary systems fluids and the saltwater cooling system.

Separate and distinct mechanical boundaries prevent radioactive water from entering the saltwater cooling system. The first boundary would be a heat exchanger (e.g., shutdown heat exchanger). The second boundary is the component cooling heat exchanger tube walls. Both of these boundaries must be breached to allow radioactivity to enter the saltwater cooling system.

The component cooling water system is periodically sampled for activity. These grap samples would indicate any activity in the component coolding water system in the unlikely event that a passive pressure boundary failed.

The component cooling water system has surge tank volume of approximtely 5,000 gallons. Significant leakage of potentially radioactive fluid into or out of the component cooling water system would result in a surge tank high/low level alarm. The difference in volume between the normal level and high/low level alarm is approximately 900 gallons. Significant leakage would therefore be rapidly detected by the operators and appropriate measures taken.

As the salt water cooling system flow is fixed, routine manual sampling of this system will result in a sample which is proportional to the volume discharged. This is acceptable until such time as continuous proportional samplers can be installed.

ENCLOSURE 4

DISCUSSION OF CONTAINMENT PURGE SAMPLING PRESENT PROVISION

Two NMC gaseous radiation monitors, RE-7804-1 and RE7807-2, (FSAR-11.5.2.1.4.5) presently monitor containment airborne activity. Monitor RE-7804-1 samples the containment atmosphere at approximately elevation 90 feet (same vicinity as the mini-purge exhaust) and monitor RE-7807-2 samples at approximately elevation 35 feet. Extensive mixing of the containment atmosphere by the normal HVAC units ensures that either sample location is representative of the entire containment atmosphere, and therefore considered to be representative of the containment purge effluent stream. In particular, either sample location will be representative of the large purge-system effluent stream, due to the multiple distribution lines of this system within containment. These monitors provide the capability for Iodine, particulate and gas grab sampling. A correction factor will be applied to the sample analysis to account for sample line deposition. Flow indication is provided on the monitor. Based on the above, these monitors will be used to obtain composite samples of the purge stream as required by Technical Specifications.

ENCLOSURE 1

Technical Specification Changes