

DESCRIPTION OF PROPOSED CHANGE NPF-10-28 AND SAFETY ANALYSIS
AMENDMENT APPLICATION NO. 10 OPERATING LICENSE NPF-10

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

Existing Specification

See Attachment "A"

Proposed Specification

See Attachment "B"

Reason for Proposed Change

Failure of the containment purge system noble gas activity monitor 2RT-7804-1 prevents containment purging to reduce containment pressure buildup. Containment pressure buildup in excess of the limits of Technical Specification 3.6.1.4 will force shutdown. This proposed change will permit limited containment purging with 2RT-7804-1 inoperable.

Safety Analysis of the Proposed Change

Noble gas activity monitor 2RT-7804-1 is provided to monitor and control the release of activity during containment purging operations. When 2RT-7804-1 is inoperable, the proposed change would fulfill the requirement to monitor and control the release of activity when purging is required by: (1) using wide range monitor 2RT-7865-1 to monitor purge effluent; and (2) using an operator to manually suspend containment purging should 2RT-7865-1 indicate high activity in the containment purge effluent and realign 2RT-7865-1 to its normal vent stack post-accident monitoring position. Containment purging would be limited to a maximum of two hours per day using this method.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-28 does not present significant hazard considerations not described or implicit in the Final Safety Analysis; (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.

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ATTACHMENT A

TABLE 3.3-13 (Continued)

TABLE NOTATION

- * At all times.
 - ** During waste gas holdup system operation (treatment for primary system offgases).
 - a) In accordance with Table 3.3-6 ACTION 19
 - b) In accordance with the ACTION Requirements of Specification 3.4.5.1 (Modes 1, 2, 3 and 4)
 - c) In accordance with the ACTION Requirement of Specification 3.9.9 (Mode 6)
- ACTION 35 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, the contents of the tank(s) may be released to the environment for up to 14 days provided that prior to initiating the release:
- a. At least two independent samples of the tank's contents are analyzed, and
 - b. At least two technically qualified members of the Facility Staff independently verify the release rate calculations and discharge valve lineup;
- Otherwise, suspend release of radioactive effluents via this pathway.
- ACTION 36 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided the flow rate is estimated at least once per 4 hours.
- ACTION 37 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided grab samples are taken at least once per 8 hours and these samples are analyzed for gross activity within 24 hours.
- 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.
- ACTION 39 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, operation of this system may continue for up to 14 days. With two channels inoperable, be in at least HOT STANDBY within 6 hours.
- ACTION 40 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via the affected pathway may continue for up to 30 days provided samples are continuously collected with auxiliary sampling equipment as required in Table 4.11-2.

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ATTACHMENT B

TABLE 3.3-13 (Continued)

TABLE NOTATION

* At all times.

** During waste gas holdup system operation (treatment for primary system offgases).

a) In accordance with Table 3.3-6 ACTION 19

b) In accordance with the ACTION Requirements of Specification 3.4.5.1 (Modes 1, 2, 3 and 4)

c) In accordance with the ACTION Requirement of Specification 3.9.9 (Mode 6)

ACTION 35 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, the contents of the tank(s) may be released to the environment for up to 14 days provided that prior to initiating the release:

a. At least two independent samples of the tank's contents are analyzed, and

b. At least two technically qualified members of the Facility Staff independently verify the release rate calculations and discharge valve lineup;

Otherwise, suspend release of radioactive effluents via this pathway.

ACTION 36 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided the flow rate is estimated at least once per 4 hours.

ACTION 37 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided grab samples are taken at least once per 8 hours and these samples are analyzed for gross activity within 24 hours.

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.)

ACTION 39 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, operation of this system may continue for up to 14 days. With two channels inoperable, be in at least HOT STANDBY within 6 hours.

ACTION 40 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via the affected pathway may continue for up to 30 days provided samples are continuously collected with auxiliary sampling equipment as required in Table 4.11-2.

Note 1

Containment purge with Noble Gas Activity Monitor 2RT-7804-1 inoperable is permissible for no more than two hours per day provided that:

- (1) Vent stack monitor 2RT-7865-1 is aligned to the purge stack for the duration of the purge.
- (2) In the event of a high activity alarm on 2RT-7865-1 during the purge, an operator will (1) suspend containment purge and then (2) realign 2RT-7865-1 to the vent stack.
- (3) When purging is completed, 2RT-7865-1 is returned to its normal alignment.

BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON)	
COMPANY, <u>ET AL.</u> for a Class 103 license to)	DOCKET NO. 50-361
Acquire, Possess, and Use a Utilization)	
Facility as Part of Unit No. 2 of the San)	Amendment Application
Onofre Nuclear Generating Station)	No. 8

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90,
hereby submit Amendment Application No. 8.

This amendment application consists of Proposed Change NPF-10-4 to the Appendix A Technical Specifications of Facility Operating License No. NPF-10. Proposed Change NPF-10-4 is a request to extend the surveillance interval for the Engineered Safety Feature Actuation System subgroup relays from the present 6 month interval to an 18 month (refueling) interval.

Pursuant to 10 CFR 170.22, the proposed change contained in Amendment Application No. 8 is considered to constitute a Class II Amendment. The basis for the determination is that the change has no safety or environmental significance.

Accordingly, the fee of \$1,200.00 corresponding to this determination is remitted herewith as required by 10 CFR 170.22.

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